UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 17 2017

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 00000 7662 6781
RETURN RECEIPT REQUESTED

Mr. Tom Szweda
Environmental Health Safety and Facility Manager
ATK Space Systems
1365 Technology Court
Dayton, Ohio 45430

Re: Notice of Violation
Compliance Evaluation Inspection
EPA RCRA ID No.: OHR000154120

Dear Mr. Szweda:

On July 24, 2013, representatives of the U.S. Environmental Protection Agency and Ohio Environmental Protection Agency inspected the ATK Space Systems facility located in Dayton, Ohio. As a large quantity generator of hazardous waste, ATK Space Systems is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate ATK Space Systems' compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by ATK Space Systems, EPA's review of records pertaining to ATK Space Systems, and the inspector's observations, EPA has determined that ATK Space Systems has unlawfully stored hazardous waste without a permit or interim status as a result of ATK Space Systems' failure to comply with certain conditions for a permit exemption Ohio Admin. Code § 3745-52-34(A)-(C) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which ATK Space Systems was out of compliance at the time of the inspection in paragraphs 1- 2, below.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ohio Admin. Code chs. 3745-65 to 68 and 3745-256, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD

requirement. The exemption conditions identified in paragraphs 1 - 2 are also independent TSD requirements incorporated from Ohio Admin. Code chs. 3745-65 to 68 and 3745-256. Accordingly, each failure of ATK Space Systems to comply with these conditions is also a violation of the corresponding requirement in Ohio Admin. Code chs. 3745-65 to 68 and 3745-256 [40 C.F.R. Part 265] (if the facility should have fully complied with the requirements for interim status), or Ohio Admin. Code chs. 3745-54 to 57 and 3745-205 [40 C.F.R. Part 264] (if the facility should have been permitted).

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS

At the time of the inspection, ATK Space Systems was out of compliance with the following large quantity generator permit exemption conditions:

1. Training

A large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. *See* Ohio Admin. Code chs. 3745-52-34(A)(4) and 3745-65-16(A) [40 C.F.R. §§ 262.34(a)(4) and 265.16(a)]. Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, and must take part in an annual review of this initial training thereafter. *See* Ohio Admin. Code chs. 3745-52-34(A)(4) and 3745-65-16(B) and (C) [40 C.F.R. §§ 262.34(a)(4) and 265.16(b) and (c)].

With respect to this training program, a large quantity generator must maintain the following documents and records at its facility:

1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;

2) A written job description for each position at the facility related to hazardous waste management including the requisite skill, education, or other qualifications and duties assigned to each position;

3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and

4) Records that document that the training or job experience described above has been given to and completed by facility personnel. *See* Ohio Admin. Code chs. 3745-52-34(A)(4) and 3745-65-16(D) [40 C.F.R. §§ 262.34(a)(4) and 265.16(d)].

At the time of the inspection, ATK Space Systems did not have and was unable to provide in response to a request a written description for each position related to hazardous waste management at the facility, 2) above.

At the time of the inspection, ATK Space Systems did not have and was unable to provide in response to a request a written description of the type and amount of introductory and continuing training required of employees with duties related to hazardous waste management, 3) above.

2. Contingency Plan

All large quantity generators are required to have a contingency plan. The contingency plan must describe the actions facility personnel must take to comply with "Content of contingency plan" and the requirement to submit a written report within 15 days after the event, found at Ohio Admin. Code chs. 3745-20-34(A)(4), 3745-65-52(A and D) and 3745-65-56(I) [40 C.F.R. §§ 262.34(a)(4), 265.52(a) and 265.56(i)].

With respect to this contingency plan, a large quantity generator must have a contingency plan listing names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator ("incident commander" in ATK Space Systems' plan). The contingency plan must explain the actions emergency coordinators must take to comply with emergency procedures, including submission of a written report on the event that caused implementation of the contingency plan within 15 days after the event.

At the time of the inspection, ATK Space Systems' Emergency Response Plan did not include home addresses and phone numbers for RCRA emergency coordinators. ATK Space Systems' Emergency Response Plan (and Waste Management Environmental Procedure) did not include the requirement for submittal of a written report within 15 days after the event prompting implementation of the contingency plan.

Summary: By failing to comply with the conditions for a permit exemption, above, ATK Space Systems became an operator of a hazardous waste storage facility, and was required to obtain an Ohio hazardous waste storage permit. ATK Space Systems failed to apply for such a permit. ATK Space Systems' failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ohio Admin. Code chs. 3745-50-45(A) and 3745-50-41(A) and (D) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption

condition incorporated from Ohio Admin. Code chs. 3745-65 to 68 and 3745-256 is also an independent violation of the corresponding TSD requirement.

At this time, EPA is not requiring ATK Space Systems to apply for an Ohio hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraphs 1 - 2, above.

After the inspection, as documented in an email dated July 29, 2013 to EPA, you took certain actions to establish compliance with the above 1. "Training" subparagraph 4 condition. Your letter or email did not include any actions you may have taken related to paragraph 2. "Contingency plan" condition. According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, you have taken related to paragraphs 1 (Training [job descriptions]) and 2. (Home addresses and phone numbers for RCRA contingency plan emergency coordinators). You should submit your response to Ms. Sue Rodenbeck Brauer, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-17J, Chicago, Illinois 60604."

If you have any questions regarding this letter, please contact Ms. Sue Rodenbeck Brauer, of my staff, at (312) 353-6134 or at Brauer.sue@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Tom Koch, Ohio EPA (Tom.Koch@epa.ohio.gov) (w/enclosure)
Mitch Mathews (Mitchell.Mathews@epa.ohio.gov) (w/enclosure)

U. S. Environmental Protection Agency
Region 5, Land and Chemicals Division
RCRA Branch
77 West Jackson Boulevard
Chicago, Illinois 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME:	ATK Space Systems
EPA ID NUMBER:	OHR 000 154 120
ADDRESS:	1365 Technology Court Dayton, Ohio 45430
DATE OF INSPECTION:	July 24, 2013
EPA INSPECTOR:	Sue Rodenbeck Brauer Environmental Scientist/Enforcement Officer

PREPARED BY: Sue Rodenbeck Brauer — April 2, 2014

Sue Rodenbeck Brauer
Compliance Section 2

Date

ACCEPTED BY: _____ — 4/3/14

Julie A. Morris, Chief
Compliance Section 2

Date

Purpose of Inspection

This inspection was an evaluation of ATK Space Systems' (ATK's) compliance with hazardous waste regulations found at Ohio Administrative Code (OAC) 3745-50-01 et seq. and Title 40 of the Code of Federal Regulations, Parts 260-279 (40 CFR 260-279). I performed the inspection with Mr. Tom Koch of Ohio Environmental Protection Agency's (OEPA's) Southwest District Office. The inspection was an EPA led Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI). The site notified as a hazardous waste large quantity generator (LQG) in 2009. ATK's North American Industrial Classification Codes are 33451 and 336413.

Participants

Inspector(s):

Sue Rodenbeck Brauer, Environmental Scientist, Land and Chemicals Division, Region 5 EPA
Tom Koch, Environmental Specialist II, Div. of Materials and Waste Management, OEPA

Site Representative(s):

Tom Szweda, Certified Safety Professional[1], Environmental, Health, Safety & Facility Manager
Keith Pears, Security Manager, Military Systems

Introduction

On July 24, 2013, I met Mr. Koch before we arrived at the facility. We signed in at the reception desk at 9:20 a.m. I asked the receptionist/security guard for the plant manager or EHS manager, Mr. Tom Szweda. We were informed that he would be in a meeting for twenty minutes. Mr. Koch and I agreed to wait. Upon Mr. Szweda's arrival, Mr. Koch and I introduced ourselves. I presented my Enforcement Officer credentials and a business card. Mr. Koch provided business cards. The business cards are Attachment A.

Initially, Mr. Szweda was inclined to deny the inspectors access because ATK Systems is a U.S. Department of Defense subcontractor and its subcontract(s) require a certain level of secrecy. At 9:40 a.m. Mr. Szweda asked Mr. Koch and me to leave our cell phones and cameras in front of the reception area. At 9:45 a.m., Mr. Pears, the Security Manager, needed to check whether the facility's approved camera was available. Rather than protest the requirement to use the facility's camera, I agreed to use their camera in order to perform the inspection that day.

Site Description

While Mr. Pears was checking on the availability of their camera, Mr. Szweda provided the following facility background. ATK Aerospace Systems ("ATK") has been in its current location since 2009. ATK manufactures antennas and radomes. In general, there are three processes. First, the etching process generates hazardous waste at the large quantity generator rate. Mr. Szweda surmised that ATK may generate at a lower hazardous waste generator rate in 2013. The second process is making composites of foam integrated with antennae. The composites are autoclaved or cured for two to twelve hours. Third, ATK generates some waste by painting. The daily paint usage is in milliliter units according to Mr. Szweda.

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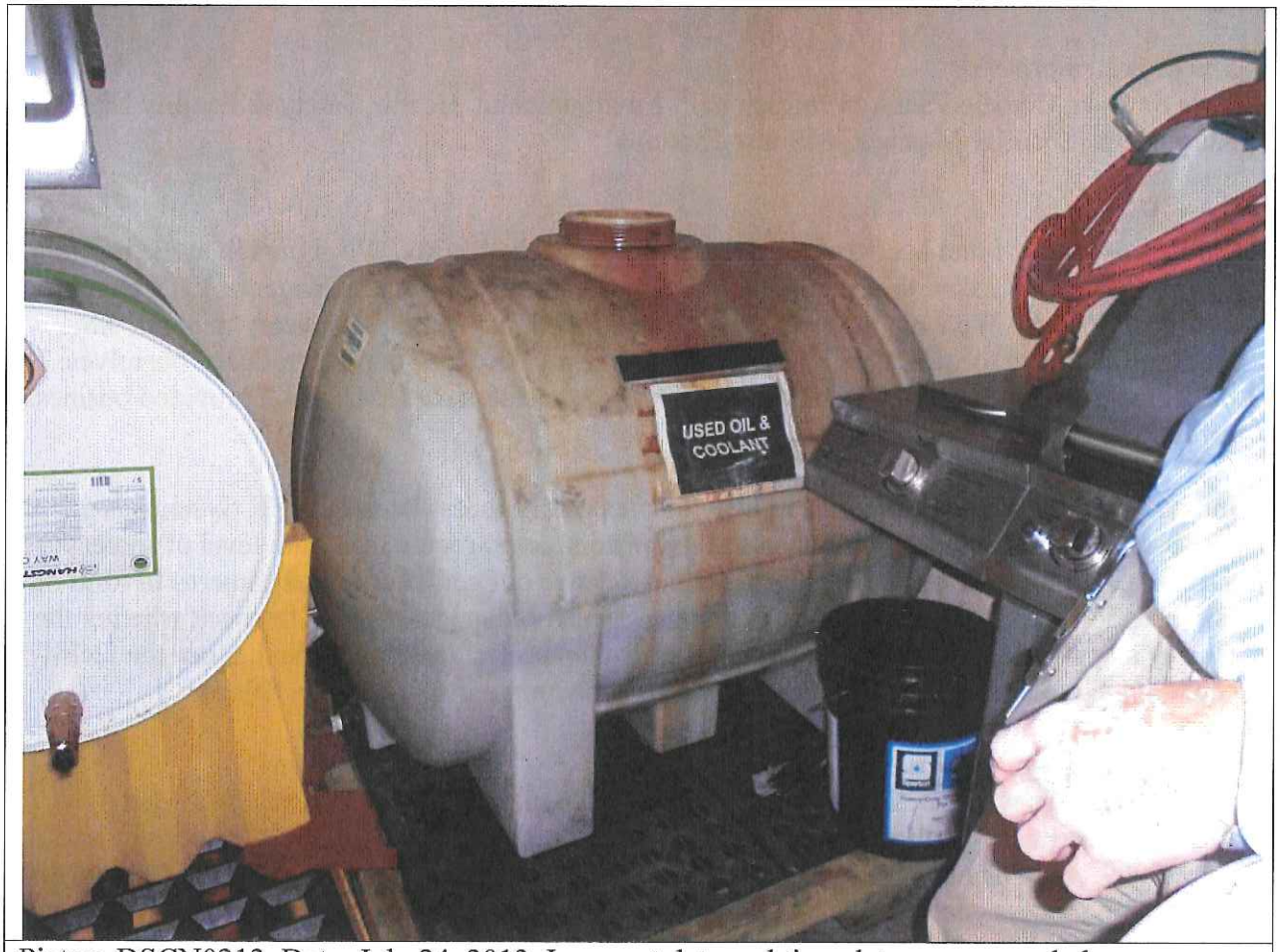
[1] See http://www.bcsp.org/CSP, accessed 3/24/2014.

Site Tour

Once Mr. Sears had returned with the facility camera and Mr. Szweda had provided a copy of the Emergency Evacuation Map (Attachment B), the site tour began. Mr. Szweda saw that Mr. Koch and I were wearing appropriate protective boots and safety glasses. Mr. Szweda showed us the anechoate chamber used to test antennae. We were not allowed to enter an optics lab (room 1227) and a machine shop. I asked how the fluid or coolant from the machines was managed. Mr. Szweda replied that it is managed by Clean Harbors as "non-RCRA." Mr. Szweda and Mike Pekar, Vice President, talked at 10:30 a.m. Mr. Szweda commented that the need for the open machine shop with blasting machines was much reduced. Franklin Metal receives the metal scrap ATK generates.

I took pictures of the waste accumulation area, which contained used oil, coolant, and drums of metal scrap.



Picture DSCN0213. Date: July 24, 2013. Incorrect date and time data were recorded.
Location: OHR000154120, Utility East room.
Description: The "used oil and coolants"-labeled tank on the right has a 200 gallon capacity. The drum on a yellow cradle contains product.

I saw a parts washer in the machine shop. A nearby Crystal Clean solvent container was empty. According to Mr. Szweda, use of the parts washer generates waste about once a year. He later

commented that ATK is on a ninety-day schedule with Clean Harbors for hazardous waste management.

Next stop on the tour was the QA room. We saw two x-ray machines that were inoperable and coordinate measuring machines.

We entered the supply cage from which off-spec, expired, and no longer used products generated waste. Mr. Szweda commented that some pre-impregnated resin fibers are flammable. I asked about a roll of material and Mr. Szweda stated ATK's intention to transfer it to a prosthetic manufacturer in Troy, Ohio.

The R&D composite room is used for high temperature aircraft applications. Ceramics are fired in a kiln. The R&D Metallic room was closed. It is secure storage.

We entered a painting prep room. I saw an acetone bottle. Mr. Szweda told me that solvent rags are taken to the paint booth. I took the photograph below of the prep room waste accumulation area. I noticed spent isopropyl alcohol-used paper wipes placed in the solid waste can.

Picture DSCN0214. Date: July 24, 2013. Incorrect date and time data were recorded.
Location: OHR000154120, Prep room.
Description: The drum labels from left to right are: (1) "Paint water waste;" (2) "Flammable Liquid" product; (3) "Hazardous Waste" paint-solvent liquid, acetone, isopropyl alcohol, paint; (4) "Hazardous Waste Container" Chemfilm (solid), debris (cups, rags, etc.), Alumiprep 33, Alodine 1201; (5) "Hazardous Waste" paint-solvent (solid), paint booth filters, paint debris (cups, rags, etc), solvent rags. The lid on drum (5) is not fastened shut.

Next, we visited the etch lab where ATK produced circuit cards. See the "Chemical Etch Lab" under the heading "Fabrication Highlights" on page 3 of Attachment C, an ATK information brochure.

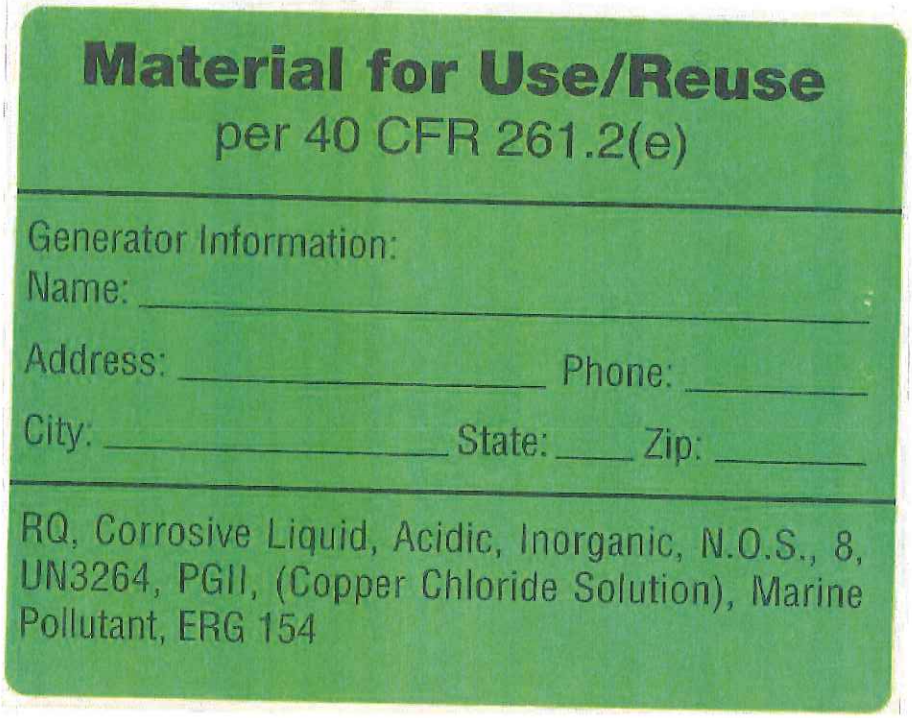
Picture DSCN0215. Date: July 24, 2013 Incorrect date and time data were recorded.
Location: OHR000154120, Etch lab.
Description: Red light is safe light for the etch process. The left blue drum is labeled "Hazardous Waste" and HCl mop water," and "Oxidizer" is left from the previous drum use. The middle blue drum is labeled "Hazardous Waste" and "stripper rinse." The small blue drum on the right is labeled, "Hazardous Waste," and "Chromosulfuric HCl copper sulfate."

Spray etch waste (liquids and solids) was enclosed with a tent-like structure. Mr. Szweda said that the last time it had run was a while ago. He commented that ATK sees itself as an R&D facility and that the production of chips was exceptional.

I observed that a fire extinguisher in the Etch lab was serviced in May 2013. An emergency exhaust is available in case of chlorine gas generation.

Picture DSCN0216. Date: July 24, 2013. Incorrect date and time data were recorded.
Location: OHR000154120, Etch lab.
Description: The middle white drum of less than twenty gallons capacity is labeled "Hazardous Waste," and "nitric/ferric." The green drum contains 50% sulfuric acid product. The black drum on the left is labeled corrosive and toxic. It is product. As in DSCN0215, the light is red.

Sodium hydroxide and potassium hydroxide, water developer, and stripper waste are combined. The middle chamber is etcher (etch process line picture in Attachment C). The etchant is cupric chloride. ATK makes cupric chloride from tribasic cupric chloride. The drummed by-product is sent to Micronutrients in Indianapolis, Indiana for its copper value. Mr. Szweda commented that the cupric chloride waste put him over the large quantity generator threshold. Mr. Szweda provided an example sticker label, "Material for Use/Reuse per 40 CFR 261.2(e)" (below). Later in the inspection, Mr. Szweda provided database summaries of manifested shipments for 2011-2013 including shipments of D002 cupric chloride to Micronutrients.



Mr. Szweda continued the tour with descriptions of the Art, Exposure Cleanroom, the Composite Cleanroom, Panel Cure and Prep, and the autoclave. The autoclave operates under a nitrogen blanket, at 220 PSI and at 750° F.

A bucket in the break room is used to accumulate batteries.

We exited through the rear of the building to see the equipment; a cooling tower, dust collector, and a nitrogen tank. We discussed characterization of the composite dust. Mr. Szweda stated that the collector probably won't be full by 2020, meaning that it is oversized and that ATK does not generate a lot of dust. Mr. Koch said that ATK wouldn't need to do TCLP metals. I did not observe anything at ATK that explicitly identified the materials used to make foam.[2]

Metal scrap is accumulated in closed metal drums behind the building. A fork truck is needed to lift them, reducing the likelihood of theft.

I took a picture of a black mystery drum on a containment skid. By 'mystery drum,' I mean that Mr. Szweda knew the drum did not come from ATK. He stated that people have dropped off waste without permission at ATK before. The black drum looked like it held oil. The drum bung was missing. Rainwater could have entered the drum.

[2] After the inspection, I found aerospace foam articles on Wikipedia. The composition varies, depending on application. Some ultra high temperature foams are made of Hafnium or Thallium diboride. According to Wikipedia, the different types of thermoset polymer matrices used in composites include are: Bis-Maleimids (BMI), Epoxy (Epoxide), Phenolic (PF), Polyester (UP), Polyimide, Polyurethane (PUR), Silicone. None of these foams are made from obviously toxic hazardous constituents. I assume that the foam would contribute to dust.

	
Picture: DSCN0217. Date: July 24, 2013. Incorrect date and time data were recorded. Location: OHR000154120, rear parking lot located north of building. Description: The mystery drum contents have an oily iridescent appearance. The liquid level was below the second of two drum ribs.	Picture: DSCN0218. Date: July 24, 2013. Incorrect date and time data were recorded. Location: OHR000154120, rear parking lot located north of building. Description: The mystery drum was standing on this secondary containment. Note the accumulated liquids which reduce the capacity available for a spill.

Picture: DSCN0219.Date: July 24, 2013. Incorrect date and time data were recorded.
Location: OHR000154120, cafeteria.
Description: The 'Call to Recycle' collection boxes are labeled as "Universal Waste Container" with "Nickel Cadmium, Nickel Metal Hydride, Lithium Ion, and Sealed Lead Acid" battery types posted on the wall above the boxes.

We entered the building, and walked to the cafeteria where there are "Call to Recycle" containers for employees to discard electronic waste. The containers did not have a start accumulation date and were not full. I asked Mr. Szweda if ATK has records of offsite shipping. He told me that the box comes pre-addressed for ease of use and wasn't sure if he had a shipping record.

Nickel-cadmium, sealed lead acid batteries, and mercury-containing batteries are specifically addressed by the "Mercury Containing and Rechargeable Battery Management Act." All rechargeable batteries are addressed by the Battery Act. All rechargeable batteries are not hazardous wastes when used and therefore all rechargeable batteries are not Universal Wastes pursuant to RCRA regulation.[3]

Mr. Koch and I left the facility for lunch and returned at 1:40 pm Eastern time.

[3] See *Introduction to Universal Waste*, EPA publication number EPA530-K-05-019, online at http://www.epa.gov/epawaste/inforesources/pubs/training/uwast05.pdf, accessed 3/31/14.

Records Review

- I reviewed the underlying hazardous characteristics (UHC) waste characterization for cupric chloride. The chain of custody identified the sample matrix as "other" rather than air, aqueous, sediment or soil. Analysis of "total metals" was requested. Test America used EPA Method 200.8 for the metals except for mercury (Method 245.1) and zinc (Method 200.7)[4].
- "Emergency Response Plan, Military Systems," a generic plan for all ATK facilities with location-specific local contacts, and emergency equipment locations, for example.
- Mr. Szweda provided a copy of ATK's waste management operating procedures, "Waste Management, Dayton."
- I reviewed ATK's Hazardous Waste Annual Report for 2011 with Mr. Szweda and asked him to identify the generating process. All were either etch lab, storage cage or painting wastes.

I completed the Large Quantity Generator Requirements, Generator LDR, Small Quantity Universal Waste Handler Requirements and Used Oil Inspection Checklists during the records review, *see* Attachment D. Select documents obtained during the inspection are Attachment E.

Closing Conference

During the closing conference, I asked what would be done with the mystery drum contents. Mr. Szweda replied that he had put the liquid into the used oil tank in the east utility room. He determined that it was oil based on smell and appearance. Mr. Szweda printed his spreadsheet summary of 2013, 2012, and 2011 manifests. Regarding proof of delivery of the Contingency Plan to emergency contacts, Mr. Szweda said that he handed it to the fire department. Finally, I asked Mr. Szweda to email records of RCRA training for Ray Barnes, painter, Kenny Johnson, Ken Ellzy, and himself. The inspection concluded after CDs of the photographs taken with the facility camera were provided to Mr. Koch and me.

Post-Inspection

Prior to completion of this inspection report, Mr. Szweda provided me with the information I had requested before leaving on July 24, 2013: training records. These documents are Attachment F.

Attachments

A. Business Cards
B. Emergency Evacuation Map
C. ATK information brochure
D. Checklists
E. Documents Copied
F. Post-Inspection Documents

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[4]Number 200.7, " Determination of Metals and Trace Elements in Water and Wastes by Inductively Coupled Plasma-Atomic Emission Spectrometry Revision 4.4" (PDF) , Number 200.8
Determination of Trace Elements in Water and Wastes by Inductively Coupled Plasma - Mass Spectrometry *Revision 5.4* (PDF) and Number 245.1, "Determination of Mercury in Water by Cold Vapor Atomic Absorption Spectrometry Revision 3.0" (PDF) (18 pp, 119K), CWA Methods of Interest Approved for use at 40 CFR 136.
in CWA Methods of Interest Approved for Use at 40 CFR 136.
http://water.epa.gov/scitech/methods/cwa/methods_index.cfm (accessed 4/2/2014).

ATTACHMENT A
Business Cards

U.S. Environmental
Protection Agency, Region 5

Sue Rodenbeck Brauer
Environmental Scientist
Land and Chemicals Division

Mail Code LR-6J
77 W Jackson Boulevard
Chicago, Illinois 60604

Telephone: (312) 353-6134
Fax: (312) 408-2231
E-mail: brauer.sue@epa.gov

Ohio
John R. Kasich, Governor
Scott J. Nally, Director
www.epa.ohio.gov/dsw/do

Environmental Protection Agency

Tom Koch
Environmental Specialist
Division of Materials & Waste Management

Southwest District Office
401 East Fifth Street
Dayton, OH 45402
937.285.6594 Fax 937.285.9789

tom.koch@epa.ohio.gov

Tom Szweda, CSP
Environmental, Health, Safety & Facility Manager

tom.szweda@atk.com

ATK Aerospace Systems
Advanced Systems
1365 Technology Court
Dayton, OH 45430
937.429.9261 ext. 4248
937.479.8984 cell
937.429.2625 fax

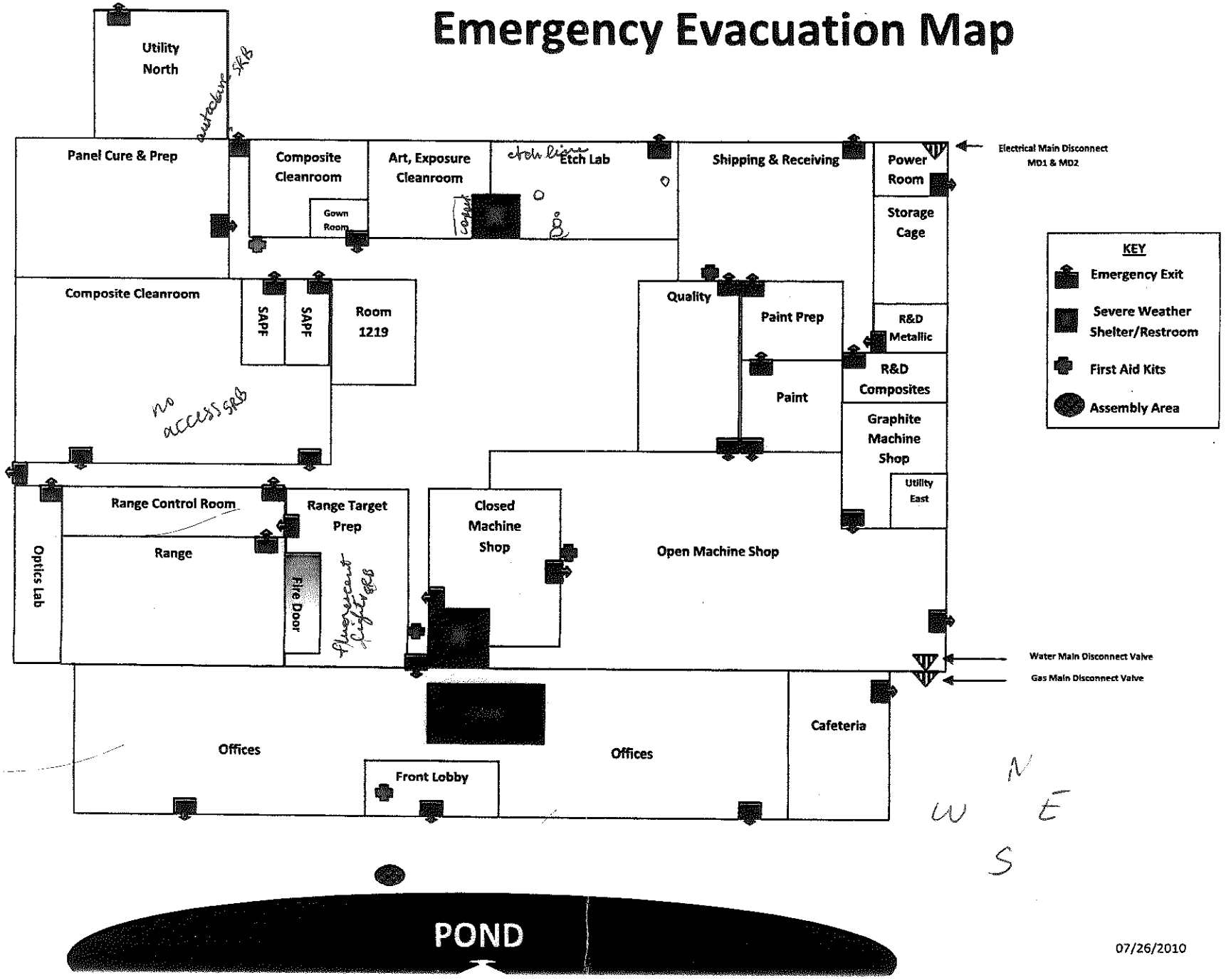
Keith Pears
Security Manager
Military Systems

keith.pears@atk.com

ATK Aerospace Group
Aerospace Structures Division
www.atk.com/militarysystems
1365 Technology Court
Dayton, OH 45430
937.490.4123
937.533.3391 cell
937.429.9256 fax

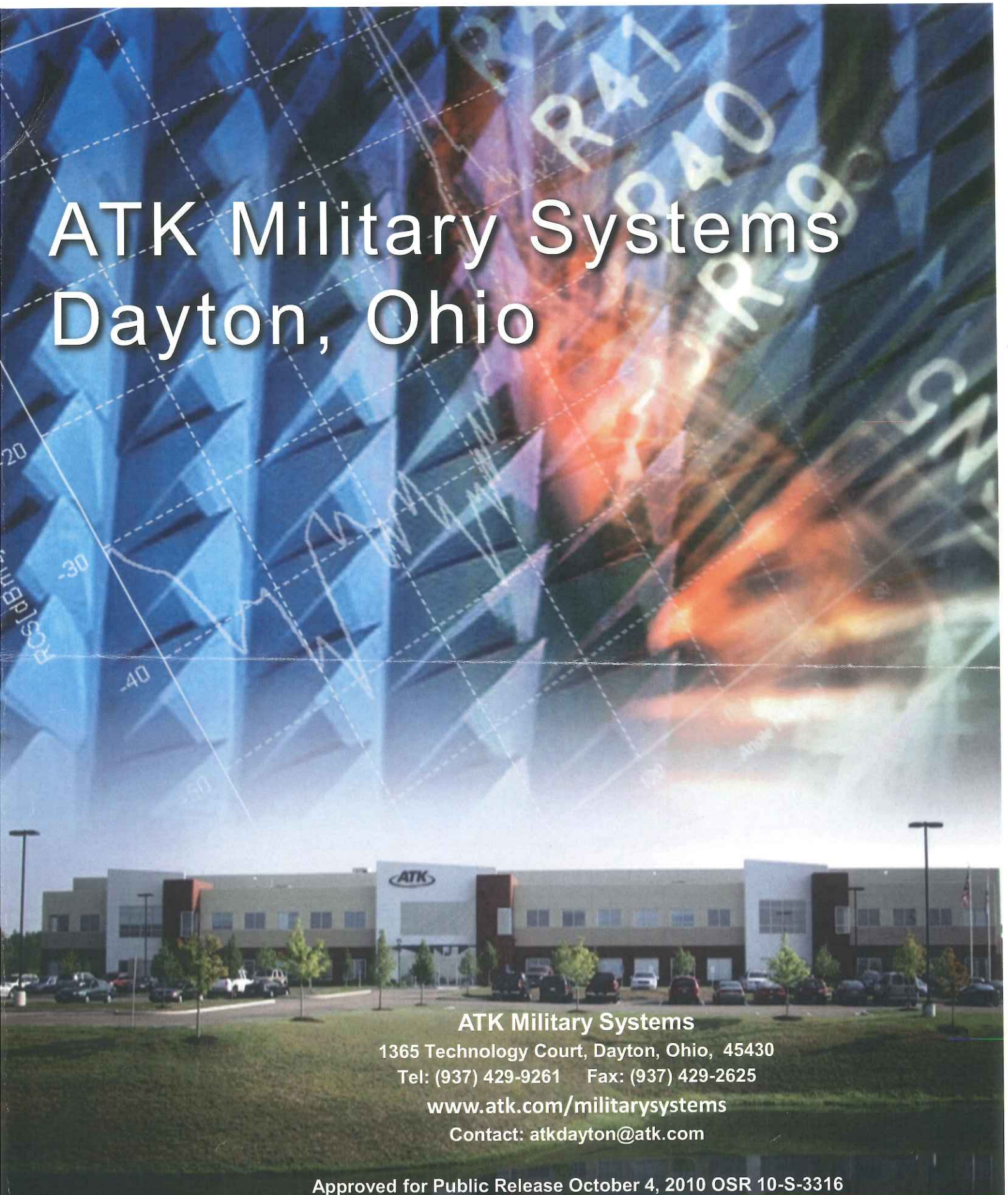
ATTACHMENT B
Emergency Evacuation Map

1365 Technology Court
Emergency Evacuation Map



07/26/2010

ATTACHMENT C
ATK Information Brochure



ATK Military Systems
1365 Technology Court, Dayton, Ohio, 45430
Tel: (937) 429-9261 Fax: (937) 429-2625
www.atk.com/militarysystems
Contact: atkdayton@atk.com

Approved for Public Release October 4, 2010 OSR 10-S-3316

Products and Services

ATK Military Systems, headquartered in Dayton, Ohio (formerly Mission Research Corporation), is dedicated to the advancement of survivable aerospace composite antennas, radomes, and structures. Our group has over 20 years experience in the design, development, fabrication, and test of environmentally qualified products. Our 175,000 ft² Dayton campus includes state of the art design, fabrication, and measurement facilities.

AS-9100 & CMMI Level-3 Certified

ATK is a $4.8 billion premier aerospace and defense company employing approximately 18,000 people.

Antennas, Sensors, and Arrays

- Communication, navigation, & identification (CNI)
- Electronic attack / electronic warfare (wideband & high power)
- Passive & active scanned phased arrays, & direction finding
- Optical sensors & microwave components

Radomes

- Lowpass & bandpass architectures with proprietary features
- Conformal, structurally qualified, & high temperature capable

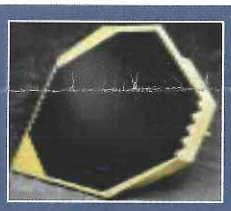
Materials & Specialty Structures

- Composite enclosures
- Skin & edge assemblies
- Bulk & thin film RF materials
- ATK proprietary inks & coatings

Engineering Design & Measurements

- Design, modeling, & analysis engineering software capability:
  - HFSS, FEKO, XFDTD, PMM
  - XPATCH, RAM2D, CARLOS
  - Pro-E, CATIA, AutoCAD
  - ABAQUS
  - Pioneer, Knowbell, Matlab
  - SPIRITS, MODTRAN (EO/IR)
- Highly specialized technical staff
- Material, component, & system RF & EO/IR measurements

CNI ANTENNAS


F-117 UHF LOCOMM


B-2 Link-16


GPS FRPA/CRPA


TCAS


UHF FT

WIDEBAND & ARRAYS


B-2 Wideband Navigation


EA Array


SH-60 LAMPS Array


CP-140 GMTI Array


Wideband Phased Array

RADOMES


B-2 EHF SATCOM Radome

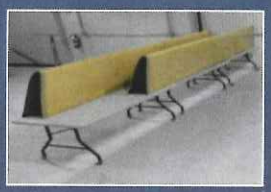

LPD Enclosure


AARGM Missile Radome


Global Hawk (3 Radomes)


DDG Deckhouse Radar Radome

MATERIAL & STRUCTURES


Leading Edges


RF Loaded Honeycomb


Patterned RF Films


B-2 Test Shroud

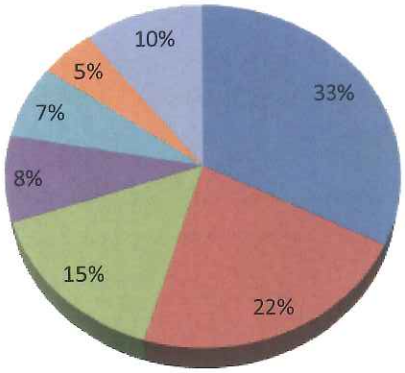

Phalanx Enclosure

Personnel

Personnel

- ATK Military Systems employs a staff of over 150 offering a variety of expertise
  - 40% (BS), 54% (MS), 6% (PhD)
  - Majority with Active Security Clearances

Technical Disciplines



- Electrical Engineering
- Mechanical/Aerospace Engineering
- Material Science/Engineering
- Physics
- Manufacturing/Industrial Engineering
- Chemistry
- Other

Fabrication Highlights

Fabrication Highlights

- Facility: 175,000 sq ft Dayton, OH with >50% approved closed areas
- Composites Fabrication: Class 100,000 material processing / lay-up
- Composite Curing:

(3) Autoclaves, including 10-ft x 30-ft , 850 F, 200psi
(8) Ovens, including 10-ft x 24-ft / 500 F
Heated Platen Press

- Machine Shop: (15) 3 & 5-axis CNC mills, lathes, wire EDMs
- Core Coating: Coating Tanks, vertical & horizontal slicing saws
- Silicon Processing: Spray & Injection Molding
- Circuits: Photolithography (wet), Chemical milling, plating
- Paint / Prep: (2) Paint Booths, 1 heated, 10' x 26' x 8' / 180 F
- Quality Assurance: (2) CMMs, Laser Tracker, Vision System, X-ray, A-Scan

Machining Shop

METALLIC AND COMPOSITE MACHINE SHOP

CNC Mills

CNC Lathe

Wire EDM

COMPOSITES

Coating Tanks

Chemical Etch Lab

Composites Lab

Autoclave

Paint Booth

QUALITY

Vision Optical Inspection

Digital X-ray

CMM

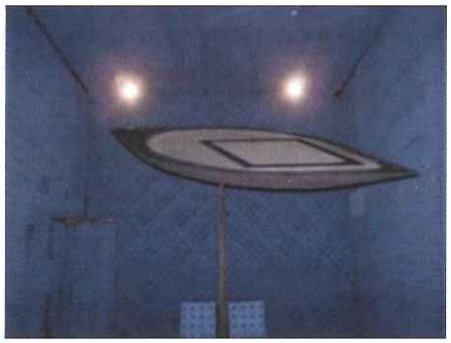
Laser

Measurements Facilities

1365 Compact Range

1365 Dayton Compact Range

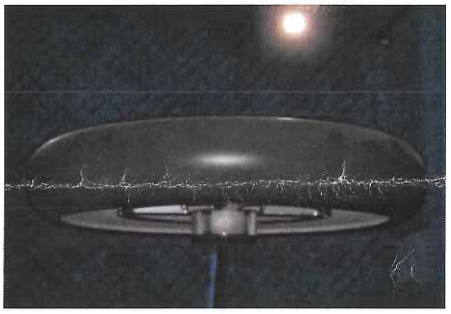
- Antenna / radome radiation pattern & RCS measurements
- Article size: 18-ft h x 18-ft w x 18-ft l, up to 3,000 lb
- Room size: 40-ft h x 52-ft w x 90-ft l
- Quiet zone: 12-ft h x 12-ft w x 12-ft l
- Frequency (compact range): 0.5 – 40 GHz (0.5-26 GHz, continuous)
- Frequency (far-field mode): 0.2 – 0.5 GHz
- Quarterbranch coherent pulse RCS measurement system
- Dual receive channels polarization matrix measurements
- RCS imaging and/or multiple frequency operation
- Variety of gain & RCS test bodies & calibration standards



3975 Compact Range Test Body (ATK Fab)

3975 Dayton Compact Range

- Antenna / radome radiation pattern & RCS measurements
- Article size: 6-ft h x 8-ft w x 15-ft l, up to 1,500 lb
- Room size: 24-ft h x 23-ft w x 60-ft l
- Quiet zone: 8-ft h x 6-ft w
- Frequency (compact range): 1.0 – 18 GHz
- Frequency (far-field mode): 0.2 – 2 GHz
- Elan 2000 coherent pulse RCS measurement system
- Dual receive channels polarization matrix measurements
- RCS imaging and/or multiple frequency operation



7-ft Diameter Rolled Edge Gain Test Fixture (ATK Fab)

Additional Measurement Capabilities

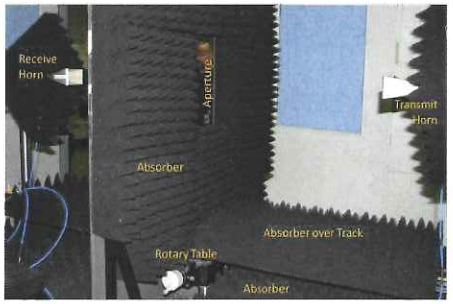
- SCI-2K Linear Rail Synthetic Aperture Radar (portable 2-18 GHz)
- Free-space transmission / reflection fixtures
- Resonant cavities (S-band & X-band)
- Material characterization (complex permittivity, permeability, & power)
- Network analyzers (quantity 4, including 67 GHz Agilent PNA)
- Waveguide kits: WR10, WR28, WR42, WR62, WR75, WR90, WR112, WR2300, & WR5100
- Rancho Bernardo, CA Compact Range, 0.3-18 GHz, 10,000 lb & 28-ft h x 40-ft w (elliptical) quiet zone; www.atk.com/RanchoBernardo
- EO / IR measurements (LWIR, MWIR)

7-ft Gain Test Fixture

WR5100 Waveguide (130-230 MHz)

Almond Target

Test Horns



Free Space Transmission Fixture

SCI-2K Linear Rail SAR

Other Locations

- Laguna Hills, California – Structural Design & Analysis
- Rancho Bernardo, California – RF Test
- Logan, Utah – Optical Sensors
- Hopkinton, Massachusetts – RF Microwave Components

ATK Military Systems Brochure 2010

ATTACHMENT D
Checklists

OHR 000 154 120
ATK Space Systems Inc.
1365 Technology Court
Dayton, OH 45430

Focus Areas

A few areas where inspectors may want to focus while performing an inspection (or requesting information in a RCRA Section 3007 information request):

NO

1. Is the company claiming the zinc secondary materials exclusion for hazardous secondary materials? If so, obtain a copy of their notification to the state agency or EPA regional administrator and verify compliance with requirements 1-8 of Table 2.
2. If the company is a generator sending their secondary materials to an intermediate handler or fertilizer manufacturer, verify that the intermediate handler or fertilizer manufacturer is located in an authorized state or an adopted with authorization pending state. Micronutrients, Inc. 1550 Research Way, Indianapolis 46324
3. Does the secondary hazardous material contain appreciable amounts of zinc? The parties should be able to provide information showing that the zinc recovery is legitimate.

↳ mostly copper

UHCs are arsenic, chromium, + zinc

INR000000463

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11] maybe not UHCs - no evidence that not used	Yes	●	No	☐	N/A	☐
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)] for cupric chloride waste, 5 years	Yes	☑	No	☐	N/A	☐
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes	☑	No	☐	N/A	☐
4.	Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] 2/28/12	Yes	☑	No	☐	N/A	☐
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes	☑	No	☐	N/A	☐
6.	Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes	☐	No	☑	N/A	☐
7.	Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes	☐	No	☑	N/A	☐
8.	Does the generator accumulate hazardous waste?	Yes	☑	No	☐	N/A	☐

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes	☐	No	☑	N/A	☐

NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]						
	a.	Container that meets 3745-66-70 to 3745-66-77?	Yes	☐	No	☐	N/A ☑
	b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes	☐	No	☐	N/A ☑
	c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes	☐	No	☐	N/A ☑
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes	☐	No	☐	N/A ☑

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist. N/A

11.	Does the generator export hazardous waste? If so:	Yes	☐	No	☑	N/A	☐
	a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes	☐	No	☐	N/A ☐
	b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes	☐	No	☐	N/A ☐
	c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes	☐	No	☐	N/A ☐
	d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes	☐	No	☐	N/A ☐

	e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes ☐ No ☐ N/A ☑
MANIFEST REQUIREMENTS			
12.		Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes ☑ No ☐ N/A ☐
13.		Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)] per Tom Koch	Yes ☑ No ☐ N/A ☐
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]			
14.		Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes ☑ No ☐ N/A ☐
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].			
15.		If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes ☐ No ☐ N/A ☑
16.		Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes ☑ No ☐ N/A ☐
17.		If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	Yes ☐ No ☐ N/A ☑
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.			
18.		If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes ☐ No ☐ N/A ☑
19.		If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes ☐ No ☐ N/A ☑
20.		Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes ☑ No ☐ N/A ☐
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.			
PERSONNEL TRAINING			
21.		Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] TBD no hazardous waste TD	Yes ☐ No ☑ N/A ☐
22.		Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)]	Yes ☑ No ☐ N/A ☐
23.		Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Env. Res. Ctr. to Szweda	Yes ☑ No ☐ N/A ☐
24.		Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes ☑ No ☐ N/A ☐
25.		Does the generator provide annual refresher training to employees? [3745-65-16(C)] not in database. certificates for Szweda	Yes ☑ No ☐ N/A ☐
26.		Does the generator keep records and documentation of:	
	a.	Job titles? [3745-65-16D(1)]	Yes ☑ No ☐ N/A ☐

"all" on "manufacturing" — HW training

	b.	Job descriptions? [3745-65-16D(2)] yes for Tom S. no for others.	Yes ☐ No ☑ N/A ☐
	c.	Type and amount of training given to each person? [3745-65-16D(3)]	Yes ☑ No ☐ N/A ☐
	d.	Completed training or job experience required? [3745-65-16D(4)] Tom S. does that assessment not written in qualification	Yes ☐ No ☑ N/A ☐
27.		Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes ☑ No ☐ N/A ☐

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the -job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained
see Attachment F of inspection report.		

CONTINGENCY PLAN

28.		Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]	Yes ☑ No ☐ N/A ☐
29.		Does the plan describe the following:	
	a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)] no hegmat - call for help	Yes ☑ No ☐ N/A ☐
	b.	Arrangements with emergency authorities? [3745-65-52(C)] call 911	Yes ☑ No ☐ N/A ☐
	c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes ☐ No ☑ N/A ☐
	d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] SRB corrected incorrect SRB	Yes ☑ No ☑ N/A ☐
	e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes ☑ No ☐ N/A ☐

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]

30.		Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)] no hospital identified ; supervisor would take MSDS of them	Yes ☐ No ☑ N/A ☐
31.		Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes ☑ No ☐ N/A ☐
32.		Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] incident commander	Yes ☑ No ☐ N/A ☐

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan: (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES

33.		Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes ☐ No ☑ N/A ☐
	a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes ☐ No ☐ N/A ☑
	b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes ☐ No ☐ N/A ☑

1st aid, CPR, AED

	c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)?	Yes ☐ No ☐ N/A ☑

NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

PREPAREDNESS AND PREVENTION

34.		Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes ☑ No ☐ N/A ☐
35.		Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:	
	a.	Internal communications or alarm system? [3745-65-32(A)] telephones in certain manufacturing areas	Yes ☑ No ☐ N/A ☐
	b.	Emergency communication device? [3745-65-32(B)] strobes	Yes ☑ No ☐ N/A ☐
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes ☑ No ☐ N/A ☐
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] very early smoke detection alarm	Yes ☑ No ☐ N/A ☐

NOTE: Verify that the equipment is listed in the contingency plan.

36.		Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes ☑ No ☐ N/A ☐
37.		Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] monthly	Yes ☑ No ☐ N/A ☐
38.		Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes ☑ No ☐ N/A ☐
39.		If there is only one employee on the premises, is there immediate access to a device (eg., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)] 9-80 work schedule phones	Yes ☑ No ☐ N/A ☐
40.		Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes ☑ No ☐ N/A ☐
41.		Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] no documentation of receipt	Yes ☑ No ☐ N/A ☐
42.		Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes ☐ No ☐ N/A ☑

SATELLITE ACCUMULATION AREA REQUIREMENTS

43.		Does the generator ensure that satellite accumulation area(s):	
	a.	Are at or near a point of generation? [3745-52-34(C)(1)] paint room red can labeling not inspected; yellow cans	Yes ☑ No ☐ N/A ☐
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes ☑ No ☐ N/A ☐
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes ☑ No ☐ N/A ☐
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes ☐ No ☐ N/A ☑
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes ☑ No ☐ N/A ☐
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes ☑ No ☐ N/A ☐
44.		Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes ☐ No ☑ N/A ☐

	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes ☐ No ☐ N/A ☑
	b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes ☐ No ☐ N/A ☑ not inspected, not full during insp

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less then 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS review photos

45.		Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes ☑ No ☐ N/A ☐
46.		Is the accumulation date on each container? [3745-52-34(A)(2)] review photos not visible or legible	Yes ☐ No ☑ N/A ☐
47.		Are hazardous wastes stored in containers which are:	
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)] see photo DSCN0214.	Yes ☑ No ☑ N/A ☐
	b.	In good condition? [3745-66-71]	Yes ☑ No ☐ N/A ☐
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes ☑ No ☐ N/A ☐
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes ☑ No ☐ N/A ☐

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

48.		Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days.	Yes ☑ No ☐ N/A ☐
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes ☑ No ☐ N/A ☐
49.		Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes ☑ No ☐ N/A ☐
50.		Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] closed waste + prod	Yes ☐ No ☐ N/A ☐
51.		If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes ☐ No ☐ N/A ☑
52.		If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes ☐ No ☐ N/A ☐

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

53.		If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745- 66-11? [3745-52-34(A)(1)]	Yes ☐ No ☐ N/A ☑

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

54.		Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes ☒ No ☐ N/A ☐ per Seaweda
55.		Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)] not full, not ready to ship CleanHarbors provides	Yes ☑ No ☐ N/A ☐

Micronutrients - manifesting + pre-transport done by ATK Space Systems

56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes ☐ No ☐ N/A ☑

Clean Harbors uses ours

GENERATOR LDR CHECKLIST DOES NOT APPLY TO CESQGS			
GENERAL REQUIREMENTS			
1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07 (A)(7)]		Yes ☐ No ☐ N/A ☑
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)]		Yes ☑ No ☐ N/A ☐
NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07 (A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).			
3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]		Yes ☑ No ☐ N/A ☐
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]		Yes ☑ No ☐ N/A ☐
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes, only F003		Yes ☑ No ☐ N/A ☐
	a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A) multiple D-codes	Yes ☑ No ☐ N/A ☐
FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.			
6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)] at least one		Yes ☑ No ☐ N/A ☐
NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.			
NOTE: Written documentation of this determination is not required.			
7.	Did the generator treat his HW /soil on-site to meet the LDR treatment standard?		Yes ☐ No ☐ N/A ☑
NOTE If "Yes" see question #16.			
8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility?[3745-270-07(A)(2)]		Yes ☑ No ☐ N/A ☐
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]		Yes ☑ No ☐ N/A ☐
10.	Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)]		Yes ☑ No ☐ N/A ☐
	a.	Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes ☑ No ☐ N/A ☐
NOTIFICATION FORM			
11.	Does the LDR Notification form contain the following information:		
	a.	Manifest number of the first waste shipment to the TSD?[3745-270-07(A)(2)]	Yes ☐ No ☐ N/A ☐ not inspected
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes ☑ No ☐ N/A ☐
	c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes ☑ No ☐ N/A ☐
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)].	Yes ☑ No ☐ N/A ☐

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NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.				
	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]		Yes ☑ No ☐ N/A ☐
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories				
	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]		Yes ☑ No ☐ N/A ☐
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.				
	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for?[3745-270-07(A)(2)]		Yes ☑ No ☐ N/A ☐
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.				
PROHIBITED DILUTION				
12.	Is the HW treated by burning? If "No" go to #15.			Yes ☐ No ☑ N/A ☐
13.	Is the HW a metal-bearing HW?			Yes ☑ No ☐ N/A ☐
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.				
14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless **one** of the following conditions apply. [3745-270-03(c)]		no H061 HWMMC
		i.	Contains > 1% TOC?	Yes ☐ No ☐ N/A ☐
		ii.	Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes ☐ No ☐ N/A ☐
		iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes ☐ No ☐ N/A ☐
		iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes ☐ No ☐ N/A ☐
		v.	Co-generated with a HW that must be combusted?	Yes ☐ No ☐ N/A ☐
	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?		Yes ☐ No ☐ N/A ☐
15.	Was the HW treated by wastewater treatment? not on-site			Yes ☐ No ☐ N/A ☑
	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]		Yes ☐ No ☑ N/A ☐
NOTE: If Yes, HW is improperly being treated by dilution.				
	b.	Does the waste carry the D001 code and contain ≥10% TOC?		Yes ☐ No ☐ N/A ☑
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?		Yes ☐ No ☐ N/A ☑
NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B) and 3745-270-40(A)(3)].				
NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.				

GENERATOR TREATMENT					
16.	Does the generator treat to meet LDRs on-site [3745-270-40(A)]?				Yes ☐ No ☑ N/A ☐
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR ~~treatment standard~~?				Yes ☐ No ☑ N/A ☐
	If "Yes""..complete the rest of the checklist. If "No"...stop...you are done.				
	a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]			Yes ☐ No ☐ N/A ☐
	b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]			Yes ☐ No ☐ N/A ☐
NOTE: This is a laboratory analysis but it does not have to be kept by the generator.					
	c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]			Yes ☐ No ☐ N/A ☐
	d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]			Yes ☐ No ☐ N/A ☐
	e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]			Yes ☐ No ☐ N/A ☐
	f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]			Yes ☐ No ☐ N/A ☐
NOTIFICATION FORM FOR GENERATOR TREATMENT					
17.	a.	Contains all information in #11 a-g above and			Yes ☐ No ☐ N/A ☐
	b.	If the treated HW/soil is listed.....notification contains the following certification statement: "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."			Yes ☐ No ☐ N/A ☐
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:			
		i.	Send a one-time notification to the director?[3745-270- 09 (D)]		Yes ☐ No ☐ N/A ☐
		ii.	Maintain a copy of the notice onsite?[3745-270-09(D)]		Yes ☐ No ☐ N/A ☐
		iii.	Include in the notification: [3745-270-09(D)(1)(a)]		
			1.	Name & address of receiving landfill?	Yes ☐ No ☐ N/A ☐
			2.	Description of HW when generated?	Yes ☐ No ☐ N/A ☐
			3.	HW code when generated?	Yes ☐ No ☐ N/A ☐
			4.	Treatability group when generated?	Yes ☐ No ☐ N/A ☐
			5.	Underlying hazardous constituents present when generated?	Yes ☐ No ☐ N/A ☐
		iv.	Contain the certification statement as required by 3745-70-07(B)(4)?		Yes ☐ No ☐ N/A ☐

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS			
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more			
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less			
PROHIBITIONS			
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes ☐ No ☑ N/A ☐	
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes ☐ No ☑ N/A ☐	
WASTE MANAGEMENT AND LABELING/MARKING			
UNIVERSAL WASTE BATTERIES			
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes ☐ No ☐ N/A ☑	
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes ☑ No ☐ N/A ☐	
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes ☐ No ☑ N/A ☐	
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes ☐ No ☐ N/A ☑	
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes ☐ No ☐ N/A ☑	
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes ☐ No ☐ N/A ☑	
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)]	Yes ☑ No ☐ N/A ☐	
UNIVERSAL WASTE PESTICIDES NA			
8.	Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]	Yes ☐ No ☐ N/A ☐	
9.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]	Yes ☐ No ☐ N/A ☐	
10.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97; 3745-66-100 and 3745-66-101 of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]	Yes ☐ No ☐ N/A ☐	
11.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(B)(4)]	Yes ☐ No ☐ N/A ☐	
12.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-14(B)(1)&(2)]	Yes ☐ No ☐ N/A ☐	
13.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-14(C)(1)&(2)]	Yes ☐ No ☐ N/A ☐	
UNIVERSAL WASTE THERMOSTATS NA			

14.	Have thermostats that show evidence of leakage, spillage or damage that could cause leaks been contained in a container that is closed, structurally sound, compatible with contents of the thermostats and lacks evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(C)(1)]		Yes ☐ No ☐ N/A ☐
15.	If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]		
	a.	Remove the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-13(C)(2)(a)&(b)]	Yes ☐ No ☐ N/A ☐
	b.	Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)&(d)]	Yes ☐ No ☐ N/A ☐
	c.	Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)]	Yes ☐ No ☐ N/A ☐
	d.	Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	Yes ☐ No ☐ N/A ☐
	e.	Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	Yes ☐ No ☐ N/A ☐
	f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-13(C)(2)(h)]	Yes ☐ No ☐ N/A ☐
16.	When removing mercury containing ampules from thermostats if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining thermostat units), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-13(C)(3)(a)]		Yes ☐ No ☐ N/A ☐
	a.	If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-13(C)(3)(b)]	Yes ☐ No ☐ N/A ☐
17.	Are thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)?" [3745-273-14[D]		Yes ☐ No ☐ N/A ☐
UNIVERSAL WASTE LAMPS NA			
18.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]		Yes ☐ No ☐ N/A ☐
19.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]		Yes ☐ No ☐ N/A ☐
NOTE: ***Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)].*** *A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.*			
20.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)]		Yes ☐ No ☐ N/A ☐

SRB 4/2/14 record of universal waste shipment 4/25/11 record. ~~not received~~
electronics waste shipment received 7/16/13

ACCUMULATION TIME			
21.	Is the waste accumulated for less than one year? [3745-273-15(A)] thanks so, covered find		Yes ☐ No ☐ N/A ☐
	a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	Yes ☑ No ☐ N/A ☐
NOTE: Accumulation is defined as date generated or date received from another handler.			
22.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below: records ~~consist~~ include certificate of recycling		Yes ☑ No ☐ N/A ☐
EMPLOYEE TRAINING			
23.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] not evident from training record/database		Yes ☑ No ☐ N/A ☐
RESPONSE TO RELEASES			
24.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]		Yes ☐ No ☐ N/A ☑
25.	Is the material released characterized? [3745-273-17(B)]		Yes ☐ No ☐ N/A ☑
26.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]		Yes ☐ No ☐ N/A ☑
OFF-SITE SHIPMENTS			
NOTE: If a SQUWH self-transports waste, then the handler must comply with the Universal Waste transporter requirements.			
27.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] WM Lamp Tracker BD		Yes ☐ No ☐ N/A ☐ no records of shipment
28.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.		Yes ☑ No ☐ N/A ☐ per Szweda
29.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]		Yes ☑ No ☐ N/A ☐ per Szweda
30.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?		Yes ☐ No ☑ N/A ☐
	a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes ☐ No ☐ N/A ☑
31.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u>:		Yes ☐ No ☐ N/A ☑
	a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)] (this change makes it like the LQUWH checklist)	Yes ☐ No ☐ N/A ☑
32.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]		Yes ☐ No ☐ N/A ☑
EXPORTS			

33.	Is waste being sent to a foreign destination? If so:		Yes ☐ No ☑ N/A ☐
	a.	Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes ☐ No ☐ N/A ☑
	b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	Yes ☐ No ☐ N/A ☑
	c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes ☐ No ☐ N/A ☑

USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS			
1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:		Yes ☐ No ☑ N/A ☐
	a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes ☐ No ☐ N/A ☑
NOTE: For example, used oil contaminated scrap metal stored in a pile.			
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]		Yes ☐ No ☑ N/A ☐
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?		Yes ☐ No ☐ N/A ☑
NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).			
GENERATOR STANDARDS			
4.	Does the generator mix hazardous waste with used oil? If so,		Yes ☐ No ☑ N/A ☐
	a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes ☐ No ☐ N/A ☐
NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.			
5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]		Yes ☐ No ☐ N/A ☐
NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.			
6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]		Yes ☑ No ☐ N/A ☐
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]		Yes ☑ No ☐ N/A ☐
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]		Yes ☑ No ☐ N/A ☐
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]		Yes ☐ No ☐ N/A ☑
	a.	Stopped the release?	Yes ☐ No ☐ N/A ☑
	b.	Contained the release?	Yes ☐ No ☐ N/A ☑
	c.	Cleaned up and properly managed the used oil and other materials?	Yes ☐ No ☐ N/A ☑
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes ☐ No ☐ N/A ☑
ON-SITE BURNING IN SPACE HEATER			
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:		
	a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes ☐ No ☐ N/A ☑

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	b.	Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour?	Yes ☐ No ☐ N/A ☑
	c.	Are the combustion gases from heater vented to the ambient air?	Yes ☐ No ☐ N/A ☑
NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).			
GENERATOR TRANSPORTATION			
11.		Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24] Clean Harbors	Yes ☑ No ☐ N/A ☐
12.		If the generator self-transports used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
	a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes ☐ No ☐ N/A ☑
	b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes ☐ No ☐ N/A ☑
NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).			
COLLECTION CENTERS AND AGGREGATION POINTS employee DIY only			
13.		Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes ☑ No ☐ N/A ☐
14.		Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes ☐ No ☐ N/A ☑
15.		Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes ☐ No ☐ N/A ☑
NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.			

ATTACHMENT E
Documents Copied

Escalation Protocol - Safety / Env / Facilities

as of 04-22-2013

Emergency

1. Contact external emergency responders if imminent medical, fire or spill emergency

Police/Fire/EMS/Hazmat (911)

2. Contact ATK Medical Response Team if needed

Tom Szweda (x4248, 937-479-6984), Kevin Comer (x4160, 937-694-1166), Eric Vanderhorst (x4151, 937-694-9565)

Keith Pears (x4123, 937-533-3391), Stacy Bricker (x4227, 937-267-6579), Rachael Kennedy (x4166)

Phil Dent (X4116, 937-422-0124), Jonnie Collins (x4110, 937-901-1597), Joe Stratman (x4180)

Chris Richardson (x4143), Nick Warren (x4163), Bob Goldenbogen (x4174), Jay Kelley (x4264)

Mark Spegal (x4153), Gary Long (x4265), Aaron Slemker (x4265)

3. Contact Manager

If no response in 5 minutes...

4. Contact EHS/Facility Manager

Tom Szweda (x4248, 937-479-6984)

If no response in 5 minutes...

5. Contact Security

Keith Pears (x4123, 937-533-3391), Stacy Bricker (x4227, 937-267-6579)

If no response in 5 minutes...

6. Contact COE Operations Manager

Eric Vanderhorst (x4151, 937-694-9565)

If no response in 5 minutes...

7. Contact ASD Safety or Facility Director

Safety: Kory Kelly (801-775-1480, 801-698-8233), Facility: Scott Voldness (435-279-0231)

If no response in 5 minutes...

8. Contact Corporate Safety or Environment

Safety: Phil Felten (952-351-3067, 952-250-0057), Environment: David Shead (952-351-2663, 952-250-2416)

EMERGENCY RESPONSE PLAN

MILITARY SYSTEMS

Written By: Tom Szweda		Title: EH&S Manager, Military Systems	Date: 06/25/13
Approved By: Keith Pears		Title: Security Manager, Military Systems	Date: 06/26/13
Approved By: Eric Vanderhorst		Title: Site Director, Dayton	Date
Approved By: Audrey Clark	2013.07.08 13:43:45 -07'00'	Title: Site Director, Rancho Bernardo	Date:
Approved By: Dave Higham	Dave Higham	Title: Site Director, Logan	Date
Approved By: Terry Faxon		Title: Site Director, Hopkinton	Date: 7/9/13
Approved By: Mike Pekar		Title: Vice President, Military Systems	Date 07/15/13

TABLE OF CONTENTS

1. SCOPE

1.1. This procedure identifies responsibilities and actions to be taken during an emergency situation.

2. APPLICABLE DOCUMENTS

SAP-011 Incident Reporting

Site Emergency Evacuation Maps located on Military Systems Safety website

3. REQUIREMENTS

3.1. Employees shall be familiar with the locations of emergency exits, fire extinguishers, fire alarm pull stations, eyewash/showers, first aid kits and automated external defibrillators (AED's).

3.2. Each site shall identify a primary and alternate Incident Commander (IC).

Building Location	Primary IC		Alternate IC	
1365 Technology Ct.	Tom Szweda	(937) 479-6984	Keith Pears	(937) 533-3391
3975 Research Blvd.	Stacy Bricker	(937) 267-6579	Stephen Gravitt	(937) 203-5029
5016 Hempstead	Chris Clark	(937) 903-0920	Randy Haines	(937) 479-5883
Rancho Bernardo, CA	Audrey Clark	(858) 229-3668	Doug Graham	(858) 229-7786
Logan, UT	Dave Higham	(435) 757-2967	Craig Ward	(435) 757-5263
Hopkinton, MA	Terry Faxon	(508) 309-0560	Les Mills	(508) 497-9457

3.3. If the Incident Commander (IC) cannot be contacted, ATK Military Systems Security shall be contacted.

3.4. The Incident Commander (IC) or ATK Military Systems Security may delegate a competent designee during an emergency.

4. SECURING CLASSIFIED MATERIALS

4.1. ATK Military Systems Security disseminates procedures during any emergency situation which renders the facility incapable of safeguarding classified material.

4.2. Personnel safety is always first priority. Do not place yourself or others in a hazardous situation.

4.3. If time permits, secure the classified material, and spin the dial.

4.4. If classified materials are in your possession, transfer possession of the classified materials to ATK Military Systems Security at the assembly location.

4.5. If classified materials are too large and could not be removed, notify ATK

Military Systems Security immediately.

4.5.1. Admittance shall be controlled by an authorized person stationed to supervise the entrance to the area.

4.5.2. Emergency responders (e.g., police, medical, fire, etc.) that are inadvertently exposed to classified materials during an emergency will be interviewed by ATK Military Systems Security to determine the extent of the exposure.

5. TRAINING

5.1. Training will occur during new employee orientation, when changes occur in the response plans, and annually.

5.2. Training is to be completed by the Environmental, Safety and Health Manager or designee.

6. EMERGENCY DRILLS

6.1. The IC, ATK Military Systems Security, or designee will coordinate emergency response drills annually.

6.2. Emergency response drills shall be evaluated by the IC, ATK Military Systems Security, or designee and site management.

7. EXTERNAL COMMUNICATIONS

7.1. Current emergency response plans are reported to local fire and rescue teams to ensure coordination between ATK and local authorities.

7.2. All inquiries by media or contacts outside our organization will be referred to the ATK Vice President.

7.3. The Environmental, Safety and Health Manager or designee will facilitate follow-up after an emergency including clean-up procedures, disposal of recovered material and clean up residue, and written reports to ATK Corporate Environmental and Safety management and government agencies, as required.

8. EXTERNAL NOTIFICATIONS

8.1. In the event of a fatality, or if three or more employees are hospitalized for the same injury or illness, the supervisor / manager will report the accident to the nearest Area Office of the Occupational, Safety and Health Administration (OSHA), WITHIN 8 HOURS.

8.1.1. Should the OSHA office be closed, the supervisor / manager will call 1-800-321-OSHA and report the accident. The OSHA accident report shall include

- Name of the company

- Location of the accident
- Time of the accident
- Name(s) and quantity of injured personnel
- Name(s) and quantity of fatalities
- Brief description of the accident and the extent of the injuries or illness

8.1.2. Any equipment involved in an accident resulting in a serious accident or fatality will be cordoned off, de-energized, locked out and not moved until a representative of the Area Office of the Occupational, Safety and Health Administration investigates the accident and authorizes its removal. The equipment may be moved only if it is necessary to extricate the victim or to eliminate a hazardous condition.

8.2. If hazardous materials are involved, the Environmental, Safety and Health Manager, shall ensure immediate notification of the National Response Center, EPA, LEPC and fire department as required.

8.2.1. See Appendix A for details.

8.3. All verbal notifications will be documented with a written report.

9. EVACUATION EMERGENCY RESPONSE PLAN

9.1. Employees

9.1.1. In the event of a fire, gas leak, chemical spill, or other emergency requiring building evacuation, immediately notify the IC, ATK Military Systems Security, or designee.

9.1.1.1. Employees will exit the facility by the nearest exit and congregate at the building's pre-arranged Assembly area (see list below).

Building Location	Assembly Location
1365 Technology Ct.	Pond outside front of building
3975 Research Blvd.	Across circle driveway in front of building
5016 Hempstead Station	Back of parking lot, 100 ft. from main entrance
Rancho Bernardo, CA	Flagpole by main entrance area/parking lot
Logan, UT	Southeast side of parking lot, close to dumpster
Hopkinton, MA	Grassy area east of parking lot

9.1.1.2. Taking personal safety into consideration, ensure that equipment and processes are safely shutdown prior to exiting the facility.

9.1.1.3. Employees will remain at the Assembly Area until a head count is completed and additional instructions are given.

9.1.2. In the event of inclement weather, shelter arrangements will be determined and communicated to employees by the IC, ATK Military Systems Security, or designee.

9.1.3. Do not evacuate to another building or an automobile unless instructed to do so by the IC, ATK Military Systems Security, or designee.

9.1.4. Under no circumstances are employees to re-enter the building. If one or more individuals are not accounted for, immediately notify the ranking fire or emergency response official on the scene to the missing personnel and their last known location.

9.2. IC, ATK Military Systems Security or Designee

9.2.1. The IC, ATK Military Systems Security, or designee will telephone the local emergency agency (fire, hazardous materials team police, etc.) if needed, by dialing 911.

9.2.2. The IC, ATK Military Systems Security, or designee will announce evacuation instructions over the public address or phone system (if not previously initiated by other personnel).

9.2.3. The announcement will be repeated 3 times to ensure adequate warning is provided. For example:

"Attention all ATK employees and contractors. Please evacuate the building."

9.2.4. If a public address or phone system is not available to announce an evacuation, alternative measures, such as a boat horn, shall be used to notify employees of an evacuation.

9.2.5. The IC, ATK Military Systems Security, or designee will ensure that all employees are accounted for.

9.2.6. The IC, ATK Military Systems Security, or designee may assign an employee to wait for the police, fire department or emergency response personnel outside the ATK facility and direct them to the fire's location.

9.2.7. If warranted, the IC, ATK Military Systems Security, or designee may dismiss all non-essential employees or instruct personnel to an alternate location.

9.2.8. The IC, ATK Military Systems Security, or designee will notify the ATK Military Systems Site Manager and Vice President of the situation as

soon as possible.

9.3. Managers/Supervisors

9.3.1. Manager and/or supervisors are to account for each employee within their departments.

9.3.2. Manager and/or supervisors will notify the IC, ATK Military Systems Security, or designee upon accounting for employees.

9.4. Front Desk Receptionist or Security Guard

9.4.1. The front desk receptionist or security guard will secure the Visitor Registration sign-in sheets and Facility Evacuation binder as they exit the building and give to IC, ATK Military Systems Security, or designee.

10. MEDICAL EMERGENCY RESPONSE PLAN

10.1. Employees

10.1.1. In the event of a medical emergency, immediately notify the IC, ATK Military Systems Security, designee or Medical Response Team.

10.1.2. If external emergency response is needed, stay with the employee and immediately dial 911.

10.1.3. If medical attention is required for work related injuries, reference SAP-011Incident Reporting.

10.1.4. Do not handle, clean up, or dispose of human blood or other potentially infectious materials unless you are trained.

10.1.5. Utilize the universal precautions, an approach to infection control, to where all human blood and certain human body fluids are treated as if known to be infectious for HIV, HBV, and other bloodborne pathogens.

10.2. Medical Response Team

10.2.1. Medical Response Team members are to administer medical response as outlined in CPR/Standard First Aid/AED/Bloodborne Pathogens training.

10.2.2. Medical Response Team members will be trained initially and annually in CPR/AED and Bloodborne Pathogen. Standard First Aid training is required initially and every three years.

10.2.3. Only Medical Response Team members are permitted to clean up human blood or other potentially infectious materials.

10.3. IC, ATK Military Systems Security or Designee

10.3.1. The IC, ATK Military Systems Security, or designee will ensure that appropriate medical care is provided to the injured employee.

10.3.2. Upon notification, the IC, ATK Military Systems Security, or designee

will immediately contact members of the Medical Response Team.

10.3.3. In the event of a fatality, or if three or more employees are hospitalized for the same injury or illness, the IC, ATK Military Systems Security, or designee will report the accident to the nearest Area Office of the Occupational, Safety and Health Administration (OSHA), WITHIN 8 HOURS.

10.3.3.1. See Section 7 External Notifications.

10.3.4. The IC, ATK Military Systems Security, or designee will notify the ATK Military Systems Site Manager and Vice President of the situation as soon as possible.

11. FIRE EMERGENCY RESPONSE PLAN

11.1. Employees

11.1.1. If a fire alarm or alert is activated or a fire is reported by an employee, employees must execute the Evacuation Emergency Response Plan.

11.1.1.1. In the event of a fire, do not use the elevator.

11.1.2. Fire extinguishers are meant as a means to facilitate safe exiting. Employees should never use them in an attempt to control a large fire.

11.1.2.1. If an employee is trained in the use of fire extinguishers, they may attempt to suppress an incipient (no larger than a small trash can) fire unless it becomes apparent that the fire cannot be controlled by a fire extinguisher.

11.1.2.2. The **PASS** method shall be used when using a fire extinguisher.

Pull the pin

Aim at the base of the fire

Squeeze the handle

Sweep back and forth, left to right

11.1.2.3. All employees must immediately evacuate the area when it becomes apparent that a fire cannot be controlled or when conditions become hazardous.

11.1.3. If there are flammable liquids in containers, or pipe lines supplying gas or oxygen in the areas where a fire breaks out, make every effort within the bounds of safety to remove the containers and shut off the valve controlling the gas or oxygen supply to keep the fire from spreading or exploding.

11.1.4. Change your clothes immediately if they become soaked with oil,

gasoline, kerosene, or other flammable or combustible materials.

11.1.4.1. Stay far away from furnaces and other sources of fire if your clothing has been exposed to flammable or combustible liquids.

11.1.4.2. If your clothing should catch fire, STOP DROP and ROLL. If possible, smother the flame with a blanket, coat or anything available.

11.2. IC, ATK Military Systems Security or designee

11.2.1. The IC, ATK Military Systems Security, or designee will telephone the local emergency agency (fire, police, hazardous materials team, etc.) if needed, by dialing 911.

11.2.2. The IC, ATK Military Systems Security, or designee will execute the Evacuation Emergency Response Plan.

11.2.3. The IC, ATK Military Systems Security, or designee will notify the ATK Military Systems Site Manager and Vice President of the situation as soon as possible.

12. SPILL EMERGENCY RESPONSE PLAN

12.1. Employees

12.1.1. Never respond to a spill that may jeopardize your safety or if you are unsure of the specific hazard.

12.1.2. If possible, identify the spilled material. Immediately notify the IC, ATK Security or designee.

12.1.3. In the event of a spill, execute Evacuation Response Plan if applicable.

12.2. IC, ATK Security or Designee

12.2.1. For large releases, the IC, ATK Security or designee will execute Evacuation Response Plans.

12.2.1.1. The IC, ATK Security or designee will telephone the local emergency agency (fire, police, hazardous materials team, etc.) by dialing 911.

12.2.1.2. The IC, ATK Security or designee may also need to contact other agencies (see appendix A) as required.

12.2.2. For small releases, the IC, ATK Security or designee will instruct trained employees on how to:

- Control access to the area to prevent contact or spread of the spill

- Implement spill cleanup
- Select the appropriate personal protective equipment
- Limit the spill area by blocking, diverting or confining the spill
- Stop the source of the spilled material if possible
- Decontaminate the site, personnel and equipment
- Implement cleanup and disposal of the spill

12.2.3. The IC, ATK Military Systems Security, or designee will notify the ATK Military Systems Site Manager and Vice President of the situation as soon as possible.

13. SEVERE WEATHER EMERGENCY RESPONSE PLAN

13.1. Employees

13.1.1. In the event of a tornado warning, employees will proceed to designated storm shelter areas.

Building Location	Designated Severe Weather Shelter Area
1365 Technology Ct.	1st Floor Restrooms
3975 Research Blvd.	Conference Room
5016 Hempstead Station	Restrooms
Logan, UT	Restrooms
Hopkinton, MA	Restrooms

13.2. IC, ATK Security or Designee

13.2.1. The IC, ATK Security or designee will monitor the National Weather Service, local radio, and/or the Internet to stay current on the storm's progress.

13.2.2. The IC, ATK Security or designee will verify that all shelter areas are unlocked and accessible and that first aid supplies and flashlights are stored in the shelter area.

13.2.3. When notified of a tornado warning in the area, the IC, ATK Security or designee will announce over the public address or phone system for all employees and non-employees to take cover in the designated tornado shelter areas immediately.

13.2.4. This announcement will be repeated three times to ensure adequate warning is provided. For example:

"The National Weather Service has issued a Tornado Warning for this area. **PLEASE DO NOT LEAVE THE BUILDING.** Proceed to the tornado shelter area(s) located in your building."

13.2.5. Upon notification that the tornado warning has ceased, the IC, ATK Security or designee will execute the Evacuation Emergency Response Plan and assess the sites conditions.

13.2.6. The IC, ATK Military Systems Security, or designee will notify the ATK Military Systems Site Manager and Vice President of the situation as soon as possible.

14. EARTHQUAKE EMERGENCY RESPONSE PLAN

14.1. Employees

14.1.1. If indoors, stay indoors, if outdoors, stay outdoors.

14.1.2. Take cover beneath a sturdy desk, table, and bench or in doorways, halls or against an interior wall

14.1.3. Stay away from glass windows and glass doors, and away from stored containers of hazardous material.

14.1.4. If outdoors, move away from all buildings, structures, and overhead electrical wires.

14.1.5. If operating a vehicle, stop as soon as possible, but stay inside the vehicle.

14.2. IC, ATK Security or Designee

14.2.1. After an earthquake, the IC, ATK Security or designee turns on the radio to get emergency information from local authorities.

14.2.2. Upon determination that the earthquake has ceased, the IC, ATK Security or designee will execute the Evacuation Emergency Response Plan and assess the site's conditions.

14.2.3. The IC, ATK Military Systems Security, or designee will notify the ATK Military Systems Site Manager and Vice President of the situation as soon as possible.

15. WORKPLACE VIOLENCE EMERGENCY RESPONSE PLAN

15.1. Employees

15.1.1. In the event of workplace violence or a civil disturbance, immediately notify the IC, ATK Security or designee. If warranted, dial 911.

15.1.2. Avoid physical/verbal contact with those involved and avoid sudden movements Stay away from windows and open doors.

15.1.3. If the identity of the person is unknown, watch the person's method

and direction of escape.

15.2. IC, ATK Security or Designee

15.2.1. The IC, ATK Security or designee will telephone the local emergency agency (fire, police, etc.) if needed, by dialing 911.

15.2.2. The IC, ATK Security or designee will assess the sites conditions and execute applicable Emergency Response Plans.

15.2.3. The IC, ATK Security or designee will notify the ATK Site Manager and Vice President of the situation as soon as possible.

16. BOMB THREAT EMERGENCY RESPONSE PLAN

16.1. Employees

16.1.1. If an employee discovers a suspicious device, package or letter, remain calm. Do not touch or move any suspicious device, package or letter.

16.1.2. If someone should call and say there is a bomb in the building(s), the employee receiving the telephone threat should remain calm. Be polite and exhibit interest.

16.1.3. Keep the caller on the line as long as possible and keep them talking. Ask them to repeat the message.

16.1.4. Ask the caller where the bomb is located and when it will go off, the type of bomb, their reason for planting the device, a description of the device, type of detonator, the caller's name and address, etc.

16.1.5. Pay particular attention to background noises, such as music playing, engine noises, etc.

16.1.6. Attempt to notify someone of the nature of the call, without letting the caller know.

16.1.7. In the event of a suspicious device, package, letter or bomb threat, immediately notify the IC, ATK Security or designee.

16.2. IC, ATK Security or Designee

16.2.1. The IC, ATK Security or designee will telephone the local emergency agency (fire, police, etc.) if needed, by dialing 911.

16.2.2. The IC, ATK Security or designee will assess the sites conditions and execute applicable Emergency Response Plans.

16.2.3. The IC, ATK Security or designee will notify the ATK Site Manager and Vice President of the situation as soon as possible.

17. DEFINITIONS

17.1. **Emergency** — any fire, explosion, storm damage, accident, hazardous substance incident, civil disorder, or other event which may affect personnel or property.

17.2. **Emergency Response** — the action taken during an emergency. Examples include fire fighting, evacuation, transportation of injured, process shutdown, or equipment isolation. This definition is further expanded when performing hazardous substance emergency response.

17.3. **Emergency Services** — outside support services such as fire, ambulance, police, and Hazardous Material (HAZMAT) Response Teams. Upon arrival, assume control of the situation from ATK Incident Coordinator.

17.4. **Incident Command System** — an organized system of roles, responsibilities, and standard operating procedures used to manage and direct emergency systems.

17.5. **Incident Commander (IC)** — the employee responsible for the decisions relating to the management of an incident within each facility. The Incident Coordinator is in charge at the incident until relieved by emergency response personnel.

17.6. **Medical Response Team** – ATK employees that have completed CPR/AED/First Aid and Bloodborne Pathogen training.

17.7. **Spill** - any unplanned release of a solid, liquid, or gaseous chemical.

17.8. **Large Release** - this may include a spill or discharge that escapes beyond the confines of the building or structure, such as when material reaches the soil, surface water, or atmosphere. This may also include small quantities of toxic, corrosive or other hazardous material spilled indoors.

17.9. **Small Release** - this may include small spills and spills indoor that don't release to environment.

17.10. **Tornado Watch** - conditions are right for severe thunderstorms and possible tornadoes to develop

17.11. **Tornado Warning** - conditions are right for severe thunderstorms and possible tornadoes to develop.

Appendix A – Dayton Ohio Hazardous Material Release Reporting Requirements

Agency	Reportable Spill	Time	Phone Number
LEPC	• If evacuation of local area might be required • Any quantity where control or cleanup assistance is needed • All spills reported to OEPA or NRC	Within 30 minutes	(937) 223-6323
Fire Department	• If evacuation of local area might be required • Any quantity where control or cleanup assistance is needed • All spills reported to OEPA or NRC	Within 30 minutes	1365 & 3975: (937) 426-1213 Hempstead: (937) 293-2151
Ohio EPA	• Extremely Hazardous Substances in excess of reportable quantities • CERCLA Hazardous Materials in excess of reportable quantities • 25 gallons of oil, or enough to cause sheen on surface water	Within 30 minutes	1-800-282-9378
National Response Center	• Extremely Hazardous Substances in excess of reportable quantities • CERCLA Hazardous Materials in excess of reportable quantities	Within 15 minutes	1-800-424-8802

Reportable Quantities

1. Extremely Hazardous Substances – Reportable Quantities
    a. Reference 40 CFR 355, appendices A and B
    b. Examples:
        i. Chlorine, 10 pounds
        ii. Formaldehyde, 100 pounds
        iii. Hydrocyanic acid (HCN in water), 10 pounds
        iv. Hydrogen chloride (gas), 5000 pounds
        v. Methylene diamine,
        vi. Nitric acid, 1000 pounds
        vii. Potassium cyanide, 10 pounds
        viii. Potassium silver cyanide, 1 pound
        ix. Sodium cyanide, 10 pounds
        x. Toluene diisocyanate, 100 pounds
        xi. These are not Extremely Hazardous Substances: acetone, isopropyl alcohol, toluene, xylene, copper compounds

2. Hazardous Materials – Reportable Quantities
    a. Reference 40 CFR 302, table 302.4
    b. Examples:
        i. Acetone, 5000 pounds
        ii. Ammonium bicarbonate, 5000 pounds
        iii. 2-Butanone (methyl ethyl ketone), 5000 pounds
        iv. Chromic acid, 10 pounds
        v. Copper cyanide, 10 pounds
        vi. Cupric chloride, 10 pounds
        vii. Cupric nitrate, 100 pounds
        viii. 2-Ethoxy ethanol, 1000 pounds
        ix. Ethyl acetate, 5000 pounds
        x. Ethylene glycol, 5000 pounds
        xi. Ethylene glycol monoethly ether, 1000 pounds
        xii. Ferric chloride, 1000 pounds
        xiii. Ferrous chloride, 100 pounds
        xiv. Hexane, 5000 pounds
        xv. Hydrogen cyanide, 10 pounds
        xvi. Methyl alcohol, 5000 pounds
        xvii. Methylene chloride, 1000 pounds
        xviii. Methylene dianiline, 10 pounds
        xix. Methyl isobutyl ketone, 5000 pounds
        xx. Nickel chloride, 100 pounds
        xxi. Potassium chromate, 10 pounds
        xxii. Sulfuric acid, 1000 pounds
        xxiii. Toluene, 1000 pounds
        xxiv. Unlisted hazardous waste, D001, 100 pounds
        xxv. Unlisted hazardous waste, D002, 100 pounds
        xxvi. Unlisted hazardous waste, D007 (chromium), 10 pounds
        xxvii. Unlisted hazardous waste, D009 (mercury), 1 pound
        xxviii. Unlisted hazardous waste, D011 (silver), 1 pound
        xxix. Xylene, 100 pounds
        xxx. F003, 100 pounds
        xxxi. F003 (acetone), 5000 pounds
        xxxii. F005, 100 pounds
        xxxiii. There is no RQ for ethanol, glycol ethers, isopropyl alcohol

Appendix B – Dayton Ohio Emergency Equipment

Emergency Equipment	Description/Capabilities	Location
Fire alarm pull stations	Contacts fire department, activates evacuation alarm	1365 - Single (front lobby) 3975 - Multiple (near exits) 5016 - Multiple (near exits)
Fire extinguishers	For extinguishing very small fires involving wood, paper, plastic, solvents, oil and electrical fires	1365, 3975 & 5016 - Multiple (near exits)
Spill kit	Adsorbent and neutralizing sorbent for aqueous acid and oxidizer spills	1365 – Etch Lab
Spill kit	Adsorbent for up to 1 gallon of solvent, oil, or paint-like material	1365 – Shipping/Receiving
First aid kit	For minor cuts & scrapes	1365, 3975 & 5016 – Front Desk

REVISION STATUS

Revision	Description of Change	Date
-	Initial release.	08/10/2011
A	Updated Section 3.2, Removed Section 12.2.4	06/25/2013

Description: Waste Management – Dayton	Doc. No.:	ENP - 001
	Rev. / Date:	- 08/10/2011
	Sheet:	Page 1 of 8

WASTE MANAGEMENT

DAYTON

Written By: **Tom Szweda**	Title: *EH&S Manager, Military Systems*	Date: 08/10/2011
Approved By: **Chris Clark**	Title: *Manufacturing Manager, Dayton*	Date: 8/22/11
Approved By: **Eric Vanderhorst**	Title: *Site Director, Dayton*	Date: 08/10/2011
Approved By: **Mike Pekar**	Title: *Vice President, Military Systems*	Date: 01/21/2012

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1. SCOPE

1.1. This procedure establishes requirements for the proper management and disposal of waste accumulated at ATK Dayton.

2. APPLICABLE DOCUMENTS

2.1. Government

40 CFR Part 261	Identification & Listing of Hazardous Waste
40 CFR Part 262	Standards Applicable to Generators of Hazardous Waste
40 CFR Part 273	Standards for Universal Waste Management
40 CFR Part 279	Standards for the Management of Used Oil
49 CFR Part 172	Hazardous Materials Training

2.2. ATK

SEC-003	Controlled Scrap Policy
SAP-008	Emergency Response Plan
ENF – 001	Hazardous Waste Storage Area Weekly Inspection Form
Env. Practice 7	Selection & Use of Waste Treatment, Disposal & Recycling Firms

3. REQUIREMENTS

3.1. Employees at the Dayton site shall utilize appropriate waste containers, and label, store and transport waste in compliance with this procedure.

3.2. All employees will be trained annually on these requirements.

3.3. Employees are not permitted to transport hazardous waste via roadway, which includes from building to building.

3.4. ATK Security defines the requirements for the storage and destruction of ATK Controlled Scrap. Reference SEC-003 Controlled Scrap Policy.

4. HAZARDOUS WASTE

4.1. Waste is considered hazardous if it exhibits toxic, reactive, ignitable or corrosive characteristics, or if it is an EPA listed waste.

4.2. Reference the Approved Chemical List for proper waste disposal method.

4.2.1. Examples of hazardous waste include etchants, paints, strippers, thinners, paint booth filters, adhesives, epoxies, pre-preg material, solvents, rags, q-tips, stir sticks.

4.2.2. For items not listed on the Approved Chemical List, refer to Environmental, Health & Safety for proper waste disposal.

4.3. Satellite Accumulation Areas

4.3.1. Satellite Accumulation Areas contain hazardous waste containers that are at the initial accumulation point, near or at the generation point, and under the control of the operator of the process generating it.

4.3.1.1. An example of a Satellite Accumulation Area is a solvent rag container.

4.3.1.2. An area may be classified as both a Satellite Accumulation Area and a Hazardous Waste Storage Area.

4.3.2. Employees must label containers prior to placing a hazardous waste into an empty container in a Satellite Accumulation Area,

4.3.2.1. Obtain a "Hazardous Waste" label and indicate the hazardous waste material in the "Contents" section.

4.3.2.2. Affix label to the container.

4.3.3. Employees shall ensure that hazardous waste containers are closed and secured at all times, except when filling the container.

4.3.4. If the container holding the waste leaks, the waste must be transferred to a new container.

4.3.5. Satellite accumulation requirements allow accumulation of up to 55 gallons of each waste.

4.3.6. Once a container is full employees must transfer the waste to the Hazardous Waste Storage Area.

4.3.6.1. Record the date that the container is full on the *"Accumulation Start Date"* section of the label.

4.3.6.2. Move this container to the Hazardous Waste Storage Area within three days.

4.4. Hazardous Waste Storage Areas

4.4.1. Once the volume has been exceeded in the Satellite Accumulation Area, the hazardous waste must be transferred to the Hazardous Waste Storage Area.

4.4.1.1. Containers that arrive from the Satellite Accumulation Area must be clearly marked with the date when the container became full.

4.4.2. Containers may accumulate waste while being stored in the Hazardous Waste Storage Area.

4.4.2.1. Obtain a "Hazardous Waste" label and indicate the hazardous waste material in the *"Contents"* section.

4.4.2.2. Record date you begin filling the container on the *"Accumulation Start Date"* section.

4.4.2.3. Affix the label to the container.

4.4.3. Employees shall ensure that hazardous waste containers are closed and secured at all times, except when filling the container.

4.4.4. Caps are to be threaded onto the bung and float devices are to be used when required.

4.4.5. If the container holding the waste leaks or is not in good condition, the waste must be transferred to a new container.

4.4.6. Containers must be inspected at least weekly for leaks and signs of corrosion.

4.4.6.1. Employees are to utilize ENF – 001 Hazardous Waste Storage Area Weekly Inspection Form.

4.4.7. Containers of incompatible waste must be separated by means of a spill deck, dike, berm, wall, or other structure.

4.4.8. Empty containers of hazardous waste may be disposed of in the General Waste container provided that no more than 1 inch of residue remains on the bottom of the container and it contains less than 3% of original contents.

4.4.9. 90-Day Hazardous Waste Storage Area Requirements

4.4.9.1. 90-Day Hazardous Waste Storage Areas must be equipped with and have accessible the following:

A. An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel;

B. A device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams;

C. Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment;

D. Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems

4.4.9.2. All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency

4.4.9.3. Aisle space must be sufficient (30 inch minimum) to allow unobstructed movement of emergency personnel and equipment to any area to contain or control fires or spills.

4.4.9.4. Reference SAF-008 Emergency Response Plan for established emergency procedures.

4.5. Hazardous Waste Transportation & Disposal

4.5.1. Prior to transport, the hazardous waste container must be completely closed and sealed. Bungs must be tightened, and lids must be in place with bolt rings tightened.

4.5.2. Hazardous waste disposal vendors must be selected based on the requirements of ATK Corporate *Environmental Practice #7 Selection & Use of Waste Treatment, Disposal & Recycling Firms.*

4.5.3. Hazardous waste must be shipped offsite within the time requirements based on hazardous waste generator status.

4.5.3.1. At 1365 Technology Ct, a large quantity generator, hazardous waste must be shipped within 90 days of the accumulation date.

4.5.3.2. At 5016 Hempstead and 3975 Research Blvd., conditionally exempt small quantity generators, hazardous waste must be shipped within 180 days of the accumulation date.

4.5.4. Only employees that have current DOT General Awareness Training and Resource Conservation & Recovery Act training are approved to sign hazardous waste manifests.

5. UNIVERSAL WASTE

5.1. Universal Waste includes lamps, discarded batteries, pesticides, and mercury containing thermostats.

5.1.1. Examples of universal waste lamps include incandescent, fluorescent, high intensity discharge, neon, mercury vapor, high-pressure sodium and metal halide lamps.

5.1.1.1. Designated boxes for universal waste lamp disposal are located at Hempstead and in Shipping at 1365 Technology Ct.

5.1.2. Examples of universal waste batteries include lead acid, nickel

cadmium, nickel metal hydride, and lithium ion.

5.1.2.1. Designated *Call to Recycle* boxes are located throughout the facilities for universal waste battery disposal.

5.1.3. ATK Dayton outsources pesticide application, and therefore should not be disposing of pesticides.

5.1.4. ATK Dayton outsources HVAC servicing, and therefore should not be disposing of thermostats.

5.2. Universal waste must be in containers that are closed, structurally sound, compatible with the waste and lack evidence of leakage, spillage or damage that could result in a spill.

5.3. Containers must be labeled and clearly marked. These containers should be labeled using the words "Universal Waste (name)", "Waste (name)" or "Used (name)."

5.4. Never label these containers as "Hazardous Waste."

5.5. When accumulation of a universal waste starts, show the current date on the "Accumulation Date" section of the label

5.6. Universal waste must be shipped to and delivered to another universal waste handler or to a permitted destination facility within 1 year after accumulation begins.

6. ELECTRONIC WASTE

6.1. Electronic waste includes electronic devices and components such as computers, computer monitors, and printers.

6.2. Electronic waste may not be disposed of in the General Waste containers.

6.3. Electronic waste shall be given to the IT department for proper disposal.

7. USED OIL

7.1. Used Oil is any petroleum-based or synthetic oil that has been used.

7.2. Used oil cannot be disposed of in trash or down sink/sewer drains.

7.3. Used oil must be accumulated in approved containers for disposal/ recycling.

7.4. Label containers or tanks of used oil with the words "Used Oil."

7.5. Store used oil in containers or tanks that are in good condition (not rusting or leaking).

7.6. Containers or tanks are to be closed and secured at all times, except when filling the container or tank.

7.7. If there is a leak of used oil: stop the leak, contain it, clean it up and properly manage the cleanup materials.

7.8. Use a transporter with a U.S. EPA identification number when shipping used oil off-site.

7.9. Do not mix used oil with other wastes as this might cause the whole mixture to become a hazardous waste.

8. NON HAZARDOUS WASTE

8.1. Non hazardous waste is waste that does not meet the EPA's definition of hazardous waste, universal waste, electronic waste, or used oil.

8.2. Controlled Non Hazardous Waste

8.2.1. Controlled Non Hazardous Waste is waste that is not hazardous but is identified by the EPA as requiring special disposal management.

8.2.1.1. Examples include core coating rinse water and saturated absorbents.

8.2.2. Prior to placing a controlled non hazardous waste into an empty container, employees shall obtain a "Non Hazardous Waste" label and indicate the waste material in the "Contents" section and affix it to the container.

8.2.3. Employees shall ensure that controlled non hazardous waste containers are closed and secured at all times, except when filling the container.

8.2.4. If the container holding the controlled non hazardous waste leaks or is not in good condition, the waste must be transferred to a new container.

8.3. Recyclable Waste

8.3.1. Recyclable wastes include paper, cardboard, plastic, aluminum, metal cans, metal chips.

8.3.2. Recyclable waste is to be discarded into the designated containers.

8.3.3. Recyclable waste should be in containers that are leak proof.

8.4. General Waste

8.4.1. General waste includes food, office, latex paint and other non recyclable trash.

8.4.2. General waste is to be discarded into the designated containers.

8.4.3. Latex paint may be discarded as general waste. Crack the lid open and let air dry. Once paint is dry, the container can be put in trash. NOTE: A dried "skin layer" does not qualify as a dried container.

9. DEFINITIONS

9.1. Ignitable – liquid material that has flash point less than 60 °C (140 °F)

9.2. Corrosive – dissolves metals or burns skin (pH $\leq$ 2 or pH $\geq$12.5)

9.3. Reactive – unstable or capable of producing violent chemical reaction with water, materials, etc.

9.4. Toxic – contains specified amounts of elements toxic to humans or wildlife

9.5. Listed Waste - By definition, EPA determined that some specific wastes are hazardous. These wastes are incorporated into lists published by the Agency. These lists are organized into three categories: F-list, K-list, P-list & U-list

REVISION STATUS

Revision	Description of Change	Date
-	Initial release	08/10/11

04

ATTACHMENT F
Post Inspection Documents

Brauer, Sue

From: Szweda, Thomas [Tom.Szweda@ATK.COM]
Sent: Monday, July 29, 2013 1:39 PM
To: Brauer, Sue
Cc: Koch, Tom
Subject: RE: solvent wipes rule signed
Attachments: Training_Records_for_EPA_Inspection_2013_07_29.pdf; photo.jpg

Thanks for the information Sue.

Per your request, please find attached 2 files:

- Training records from 2011-2013 for Ray Barnes, Ken Ellzey, Ken Johnson and Tom Szweda
- Picture of labeled waste container located in room 1206

Please contact me if you have any further questions.

From: Koch, Tom [mailto:Tom.Koch@epa.state.oh.us]
Sent: Monday, July 29, 2013 12:45 PM
To: Brauer, Sue; Szweda, Thomas
Subject: RE: solvent wipes rule signed

Thank you Sue! I've seen this press release. I spoke with some folks here and it sounds like Ohio EPA would still have to go through a formal adoption process. So our acceptance of this in Ohio may take some time. Thank you for the info. And thank you both on the inspection. Tom

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From: Brauer, Sue [mailto:brauer.sue@epa.gov]
Sent: Monday, July 29, 2013 11:49 AM
To: Koch, Tom; tom.szweda@atk.com
Subject: solvent wipes rule signed

Tom and Tom,

You may know more about this now than I do. Today is my first day with email access after the inspection on Wednesday, 7/24/13. The URL for the rule is in the press release below.

****

CONTACT:
Enesta Jones
jones.enesta@epa.gov
202-564-7873
202-564-4355

FOR IMMEDIATE RELEASE
July 23, 2013

EPA Reduces Regulatory Burden for Industrial Facilities Using Solvent Wipes

Common-sense exclusion will save industry up to $27.8 million per year

WASHINGTON - The U.S. Environmental Protection Agency (EPA) modified the hazardous waste management regulations under the Resource Conservation and Recovery Act (RCRA) to conditionally exclude solvent-contaminated wipes from hazardous waste regulations provided that businesses clean or dispose of them properly. The rule is based on EPA's final risk analysis, which was peer reviewed in 2008 and published for public comment in 2009, that concluded wipes contaminated with certain hazardous solvents do not pose significant risk to human health and the environment when managed properly. EPA estimates that the final rule will result in a net savings of between $21.7 million and $27.8 million per year.

Wipes are used in conjunction with solvents for cleaning and other purposes by tens of thousands of facilities in numerous industrial sectors, such as printers, automobile repair shops and manufacturers of automobiles, electronics, furniture and chemicals.

"Today's rule uses the latest science to provide a regulatory framework for managing solvent-contaminated wipes that is appropriate to the level of risk posed by these materials," said Mathy Stanislaus, assistant administrator for EPA's Office of Solid Waste and Emergency Response. "I've heard directly from stakeholders about the benefits of this rule and the need to finalize it. The rule reduces costs for thousands of businesses, many of which are small businesses, while maintaining protection of human health and the environment."

Today's final rule excludes wipes that are contaminated with solvents listed as hazardous wastes under RCRA that are cleaned or disposed of properly. To be excluded, solvent-contaminated wipes must be managed in closed, labeled containers and cannot contain free liquids when sent for cleaning or disposal. Additionally, facilities that generate solvent-contaminated wipes must comply with certain recordkeeping requirements and may not accumulate wipes for longer than 180 days.

EPA estimates that the final rule will result in a net savings of $18 million per year in avoided regulatory costs and between $3.7 million and $9.9 million per year in other expected benefits, including pollution prevention, waste minimization and fire prevention benefits.

Today's rule is consistent with President Obama's Executive Order 13563, Improving Regulation and Regulatory Review, which charges federal agencies to monitor regulatory effectiveness and to help make agency regulatory programs more effective or less burdensome in achieving the regulatory objectives.

EPA first proposed modified regulations for solvent-contaminated wipes on November 20, 2003, and published a revised risk assessment for public comment on October 27, 2009. The docket for this rulemaking is EPA-HQ-RCRA-2003-0004 and can be accessed at http://www.regulations.gov once the final rule is published.

More information about this rulemaking: http://www.epa.gov/epawaste/hazard/wastetypes/wasteid/solvents/wipes.htm

R126

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Sue Rodenbeck Brauer
Compliance Section 2, RCRA Branch, Land and Chemicals Division
U.S. EPA Region 5 (LR-8J)
77 West Jackson Boulevard

Chicago, Illinois 60604

telephone: (312) 353-6134
email: brauer.sue@epa.gov

Training Title	Employee Name	Version	Completion Date
MS - Drug-Free Workplace Compliance (WBT)	Barnes, Raymond	13	7/22/2013
MS - Respiratory Protection - Medical Eval - Safety (MED)	Barnes, Raymond	13A	7/12/2013
MS - Lockout Tagout Affected SAP-033 (WBT)	Barnes, Raymond	13	7/10/2013
MS - Lockout Tagout Authorized SAP-033 (WBT)	Barnes, Raymond	13	7/10/2013
MS - Emergency Response Plan SAP-008 (WBT)	Barnes, Raymond	13	7/1/2013
MS - Air Permit Monitoring and Recordkeeping ENP-002 (DRV)	Barnes, Raymond	13	6/27/2013
MS - Housekeeping (WBT)	Barnes, Raymond	13	5/31/2013
MS - Stairs, Walkways and Roadways SAP-016 (WBT)	Barnes, Raymond	13A	5/30/2013
MS - Respiratory Protection - Fit Test	Barnes, Raymond	13	5/15/2013
ASD - Quality Management System (ILT)	Barnes, Raymond	11	5/13/2013
MS - Respiratory Protection SAP-030 (WBT)	Barnes, Raymond	13	5/13/2013
MS - Machining Beryllium Copper SAP-025 (WBT)	Barnes, Raymond	13	4/9/2013
MS - Crane Hoist Rigger - Demonstrated Proficiency	Barnes, Raymond	13	3/21/2013
MS - Crane Hoist Rigging - Crane, Hoist & Rigging Quiz (WBT)	Barnes, Raymond	13	3/7/2013
MS - Radiation Safety, SAP-036 (WBT)	Barnes, Raymond	13	3/7/2013
MS - Crane Hoist Rigger - Cranes/Hoist Training (WBT)	Barnes, Raymond	13	3/6/2013
MS - Crane Hoist Rigger - Rigging Hardware (WBT)	Barnes, Raymond	13	3/6/2013
MS - Crane Hoist Rigging - Below the Hook (WBT)	Barnes, Raymond	13	3/6/2013
MS - Crane Hoist Rigging - Rigging Excercises (WBT)	Barnes, Raymond	13	3/6/2013
MS - Cranes Hoist Rigger - Slings (WBT)	Barnes, Raymond	13	3/6/2013
MS - Radiation Safety, SAP-036 (WBT)	Barnes, Raymond	13	3/6/2013
MS - Cranes Hoist Rigger - Hooks Training (WBT)	Barnes, Raymond	13	3/5/2013
MS - Cranes Hoist Rigger - Slings (WBT)	Barnes, Raymond	13	3/5/2013
MS - Security Knowledge Quiz (WBT)	Barnes, Raymond	13	3/5/2013
MS - Incident Reporting, SAP-011 (WBT)	Barnes, Raymond	13	1/28/2013
MS - Security Knowledge Quiz (WBT)	Barnes, Raymond	13	1/10/2013
MS - Job Safety Analysis SAP-002 (WBT)	Barnes, Raymond	13	1/7/2013
MS - Dry Ice, SAP-024 (WBT)	Barnes, Raymond	12	11/29/2012
MS - Ladders and Scaffolding, SAP-017 (WBT)	Barnes, Raymond	12	11/29/2012
MS - Proper Lifting Techniques, SAP-007 (WBT)	Barnes, Raymond	12	11/28/2012
MS - Access to Occupational Records SAP-012 (WBT)	Barnes, Raymond	12	11/26/2012
MS - Security Training-Courier Briefing (WBT)	Barnes, Raymond	12	11/20/2012
MS - Annual Timekeeping Training (WBT)	Barnes, Raymond	12	11/15/2012
MS - Powered Hand Tools & Equipment_SAP-019 (WBT)	Barnes, Raymond	12	11/13/2012
MS - Use and Care of Hand Tools_SAP-018 (WBT)	Barnes, Raymond	12	11/13/2012
MS - Environmental Awareness Training EAP-000 (WBT)	Barnes, Raymond	12	10/17/2012
MS - Compressed Gas Cylinders (WBT)	Barnes, Raymond	12	10/8/2012
MS - Welding, Burning and Cutting SAP-021 (WBT)	Barnes, Raymond	12	10/5/2012
MS - Hazard Communication SAP-010 (WBT)	Barnes, Raymond	0	9/12/2012
MS - Accident Prevention Sign and Tags SAP-013 (WBT)	Barnes, Raymond	12	8/2/2012
MS - Emergency Response Plan SAP-008 (WBT)	Barnes, Raymond	12	6/29/2012
MS - Air Permit Monitoring and Recordkeeping ENP-002 (DRV)	Barnes, Raymond	12	6/27/2012
MS - Stairs, Walkways and Roadways SAP-016 (WBT)	Barnes, Raymond	12	6/1/2012
MS - Respiratory Protection - Medical Eval - Employee (WBT)	Barnes, Raymond	13A	7/5/2011
MS - Respiratory Protection - Medical Eval - Safety (MED)	Barnes, Raymond	13A	7/5/2011

Training Title	Employee Name	Version	Completion Date
MS - Drug-Free Workplace Compliance (WBT)	Ellzey, Ken	13	7/17/2013
MS - Lockout Tagout Affected SAP-033 (WBT)	Ellzey, Ken	13	7/10/2013
MS - Emergency Response Plan SAP-008 (WBT)	Ellzey, Ken	13	7/1/2013
MS - Security Knowledge Quiz (WBT)	Ellzey, Ken	13	7/1/2013
MS - Housekeeping (WBT)	Ellzey, Ken	13	5/31/2013
MS - Stairs, Walkways and Roadways SAP-016 (WBT)	Ellzey, Ken	13A	5/31/2013
ASD - Quality Management System (ILT)	Ellzey, Ken	11	4/18/2013
MS - Employee Qual Process Training (WBT)	Ellzey, Ken	13	4/9/2013
MS - Radiation Safety, SAP-036 (WBT)	Ellzey, Ken	13	3/5/2013
MS - Incident Reporting, SAP-011 (WBT)	Ellzey, Ken	13	1/28/2013
MS - Job Safety Analysis SAP-002 (WBT)	Ellzey, Ken	13	1/7/2013
MS - Security Knowledge Quiz (WBT)	Ellzey, Ken	13	1/7/2013
MS - Security - Information Systems Users Briefing (WBT)	Ellzey, Ken	12	12/10/2012
MS - Proper Lifting Techniques, SAP-007 (WBT)	Ellzey, Ken	12	11/29/2012
MS - Security Training-Courier Briefing (WBT)	Ellzey, Ken	12	11/26/2012
MS - Annual Timekeeping Training (WBT)	Ellzey, Ken	12	11/15/2012
MS - Access to Occupational Records SAP-012 (WBT)	Ellzey, Ken	12	11/12/2012
MS - Environmental Awareness Training EAP-000 (WBT)	Ellzey, Ken	12	10/18/2012
MS - Hazard Communication SAP-010 (WBT)	Ellzey, Ken	0	9/12/2012
MS - Accident Prevention Sign and Tags SAP-013 (WBT)	Ellzey, Ken	12	8/8/2012
MS - Emergency Response Plan SAP-008 (WBT)	Ellzey, Ken	12	6/17/2012
MS - Stairs, Walkways and Roadways SAP-016 (WBT)	Ellzey, Ken	12	5/29/2012

Training Title	Employee Name	Version	Completion Date
MS - Housekeeping (WBT)	Johnson, Ken	13	7/22/2013
MS - Stairs, Walkways and Roadways SAP-016 (WBT)	Johnson, Ken	13A	6/28/2013
MS - Radiation Safety, SAP-036 (WBT)	Johnson, Ken	13	3/18/2013
MS - Incident Reporting, SAP-011 (WBT)	Johnson, Ken	13	1/28/2013
MS - Job Safety Analysis SAP-002 (WBT)	Johnson, Ken	13	1/28/2013
MS - Security - Information Systems Users Briefing (WBT)	Johnson, Ken	12	1/28/2013
MS - Security Knowledge Quiz (WBT)	Johnson, Ken	13	1/28/2013
MS - Security Training-Courier Briefing (WBT)	Johnson, Ken	12	1/28/2013
MS - Annual Timekeeping Training (WBT)	Johnson, Ken	12	11/28/2012
MS - Proper Lifting Techniques, SAP-007 (WBT)	Johnson, Ken	12	11/28/2012
MS - Access to Occupational Records SAP-012 (WBT)	Johnson, Ken	12	11/26/2012
MS - Security Training-Courier Briefing (WBT)	Johnson, Ken	12	11/19/2012
MS - Environmental Awareness Training EAP-000 (WBT)	Johnson, Ken	12	11/5/2012
MS - Hazard Communication SAP-010 (WBT)	Johnson, Ken	0	9/26/2012
MS - Accident Prevention Sign and Tags SAP-013 (WBT)	Johnson, Ken	12	8/27/2012
MS - Emergency Response Plan SAP-008 (WBT)	Johnson, Ken	12	6/17/2012
MS - Stairs, Walkways and Roadways SAP-016 (WBT)	Johnson, Ken	12	5/29/2012
Program Management Excellence (ILT)	Johnson, Ken	10	10/27/2011

Training Title	Employee Name	Version	Completion Date
MS - Accident Prevention Sign and Tags SAP-013 (WBT)	Szweda, Tom	13	7/29/2013
MS - Emergency Response Plan SAP-008 (WBT)	Szweda, Tom	13	7/10/2013
MS - Lockout Tagout Affected SAP-033 (WBT)	Szweda, Tom	13	7/10/2013
MS - Lockout Tagout Authorized SAP-033 (WBT)	Szweda, Tom	13	7/10/2013
MS - Air Permit Monitoring and Recordkeeping ENP-002 (DRV)	Szweda, Tom	13	6/26/2013
MS - Housekeeping (WBT)	Szweda, Tom	13	6/17/2013
MS - Stairs, Walkways and Roadways SAP-016 (WBT)	Szweda, Tom	13A	6/17/2013
MS - Respiratory Protection - Medical Eval - Safety (MED)	Szweda, Tom	13A	5/13/2013
MS - Respiratory Protection SAP-030 (WBT)	Szweda, Tom	13	5/13/2013
MS - Respiratory Protection - Medical Eval - Employee (WBT)	Szweda, Tom	13A	5/9/2013
ASD - Performance Management (WBT)	Szweda, Tom	2013	5/3/2013
ASD - Quality Management System (ILT)	Szweda, Tom	11	4/18/2013
MS - Bloodborne Pathogens Training (WBT)	Szweda, Tom	13	4/18/2013
MS - Medical Responder (WBT)	Szweda, Tom	13	4/18/2013
ASD - Affirmative Action, Equal Employment (ILT)	Szweda, Tom	2013	4/16/2013
MS - Employee Qual Process Training (WBT)	Szweda, Tom	13	4/16/2013
MS - Machining Beryllium Copper SAP-025 (WBT)	Szweda, Tom	13	4/16/2013
MS - First Aid/CPR/AED Training	Szweda, Tom	13	4/11/2013
MS - Radiation Safety, SAP-036 (WBT)	Szweda, Tom	13	3/13/2013
MS - Crane Hoist Rigger - Demonstrated Proficiency	Szweda, Tom	13	2/28/2013
MS - Crane Hoist Rigger - Cranes/Hoist Training (WBT)	Szweda, Tom	13	2/26/2013
MS - Crane Hoist Rigging - Crane, Hoist & Rigging Quiz (WBT)	Szweda, Tom	13	2/26/2013
MS - Crane Hoist Rigging - Rigging Excercises (WBT)	Szweda, Tom	13	2/26/2013
MS - Crane Hoist Rigger - Rigging Hardware (WBT)	Szweda, Tom	13	2/13/2013
MS - Crane Hoist Rigging - Below the Hook (WBT)	Szweda, Tom	13	2/13/2013
MS - Cranes Hoist Rigger - Hooks Training (WBT)	Szweda, Tom	13	2/12/2013
MS - Cranes Hoist Rigger - Slings (WBT)	Szweda, Tom	13	2/12/2013
MS - Incident Reporting, SAP-011 (WBT)	Szweda, Tom	13	2/5/2013
MS - Job Safety Analysis SAP-002 (WBT)	Szweda, Tom	13	1/10/2013
MS - Security Knowledge Quiz (WBT)	Szweda, Tom	13	1/10/2013
MS - Ladders and Scaffolding, SAP-017 (WBT)	Szweda, Tom	12	11/29/2012
MS - Proper Lifting Techniques, SAP-007 (WBT)	Szweda, Tom	12	11/28/2012
MS - Dry Ice, SAP-024 (WBT)	Szweda, Tom	12	11/27/2012
MS - Annual Timekeeping Training (WBT)	Szweda, Tom	12	11/16/2012
MS - Powered Hand Tools & Equipment_SAP-019 (WBT)	Szweda, Tom	12	11/13/2012
MS - Use and Care of Hand Tools_SAP-018 (WBT)	Szweda, Tom	12	11/13/2012
MS - Access to Occupational Records SAP-012 (WBT)	Szweda, Tom	12	11/12/2012
MS - Environmental Awareness Training EAP-000 (WBT)	Szweda, Tom	12	10/17/2012
MS - Compressed Gas Cylinders (WBT)	Szweda, Tom	12	10/15/2012
MS - Welding, Burning and Cutting SAP-021 (WBT)	Szweda, Tom	12	10/15/2012
MS - Hazard Communication SAP-010 (WBT)	Szweda, Tom	0	8/29/2012
MS - Accident Prevention Sign and Tags SAP-013 (WBT)	Szweda, Tom	12	7/23/2012
MS - Emergency Response Plan SAP-008 (WBT)	Szweda, Tom	12	6/25/2012
MS - Air Permit Monitoring and Recordkeeping ENP-002 (DRV)	Szweda, Tom	12	6/1/2012
MS - Stairs, Walkways and Roadways SAP-016 (WBT)	Szweda, Tom	12	5/24/2012
Fire Extinguisher/Fire Safety (WBT)	Szweda, Tom	10	12/7/2011

ATK

Safety Form

Description:

Safety/Environmental Training Documentation

Employee Name Raymond Barnes **Location** Dayton, Ohio

Job Title Painter

Training Topic: Annual Safety & Environmental Training

☐ Regulatory Overview

☐ Safety Policies & Procedures

SAP-001 Safety Policy
SAP-002 Job Safety Analysis
SAP-004 Personal Protective Equipment
SAP-005 Personal Clothing & Jewelry
SAP-006 Housekeeping
SAP-007 Proper Lifting Techniques
SAP-008 Emergency Response Plan
SAP-009 Fire Prevention
SAP-010 Hazard Communication
SAP-011 Incident Reporting
SAP-012 Access to Occupational Records
SAP-016 Stairs, Walkways & Roadways

☐ Environmental Procedures

ENP-001 Waste Management

I have been trained on and understand the topics above and agree to comply with all ATK Environmental, Health & Safety policies and procedures.

Raymond Barnes	8/16/2011		8/16/2011
Employee Signature	Date	Trainer Signature	Date

ATK

Safety Form

Description:

Safety/Environmental Training Documentation

Employee Name Ken Ellzey **Location** Dayton, Ohio

Job Title Materials Engineering

Training Topic: Annual Safety & Environmental Training

☐ Regulatory Overview

☐ Safety Policies & Procedures

SAP-001 Safety Policy
SAP-002 Job Safety Analysis
SAP-004 Personal Protective Equipment
SAP-005 Personal Clothing & Jewelry
SAP-006 Housekeeping
SAP-007 Proper Lifting Techniques
SAP-008 Emergency Response Plan
SAP-009 Fire Prevention
SAP-010 Hazard Communication
SAP-011 Incident Reporting
SAP-012 Access to Occupational Records
SAP-016 Stairs, Walkways & Roadways

☐ Environmental Procedures

ENP-001 Waste Management

I have been trained on and understand the topics above and agree to comply with all ATK Environmental, Health & Safety policies and procedures.

Employee Signature	08/24/2011 Date	Trainer Signature	08/24/2011 Date

ATK

Safety Form

Description:

Safety/Environmental Training Documentation

Employee Name Henry Johnson **Location** Dayton, Ohio

Job Title Program Manager

Training Topic: Annual Safety & Environmental Training

☒ Regulatory Overview

☒ Safety Policies & Procedures

SAP-001 Safety Policy
SAP-002 Job Safety Analysis
SAP-004 Personal Protective Equipment
SAP-005 Personal Clothing & Jewelry
SAP-006 Housekeeping
SAP-007 Proper Lifting Techniques
SAP-008 Emergency Response Plan
SAP-009 Fire Prevention
SAP-010 Hazard Communication
SAP-011 Incident Reporting
SAP-012 Access to Occupational Records
SAP-016 Stairs, Walkways & Roadways

☒ Environmental Procedures

ENP-001 Waste Management

I have been trained on and understand the topics above and agree to comply with all ATK Environmental, Health & Safety policies and procedures.

Employee Signature	Date	Trainer Signature	Date
	9/26/2011		9/26/2011

Certificate

This is to certify that
Tom Szweda
ATK Space Systems Inc.
has successfully completed

Hazardous Waste Management
Annual Update Training Online

in accordance with 40 CFR 265.16

presented by
Environmental Resource Center
101 Center Pointe Drive, Cary, NC 27513 919-469-1585
www.ercweb.com

Eric Massey, Instructor

February 5, 2013

Certificate Number: 127137

Certificate

This is to certify that
Tom Szweda
ATK Space Systems Inc.
has successfully completed

DOT Hazardous Materials Webcast

and has been trained and tested in General Awareness, Function-Specific, Safety, and Security Awareness
in accordance with the requirements of the US Department of Transportation at
49 CFR 172.702 and 49 CFR 172.704
presented by

Environmental Resource Center

101 Center Pointe Drive, Cary, NC 27513 919-469-1585
www.ercweb.com

Kristie Cook Absher

Kristie Cook Absher, Instructor

Employer

February 6, 2013

Certificate Number: CFWS15332

Certificate

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in accordance with 40 CFR 265.16
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Rebecca Spaulding

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Kristie Cook Absher, Instructor

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08

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February 9, 2011

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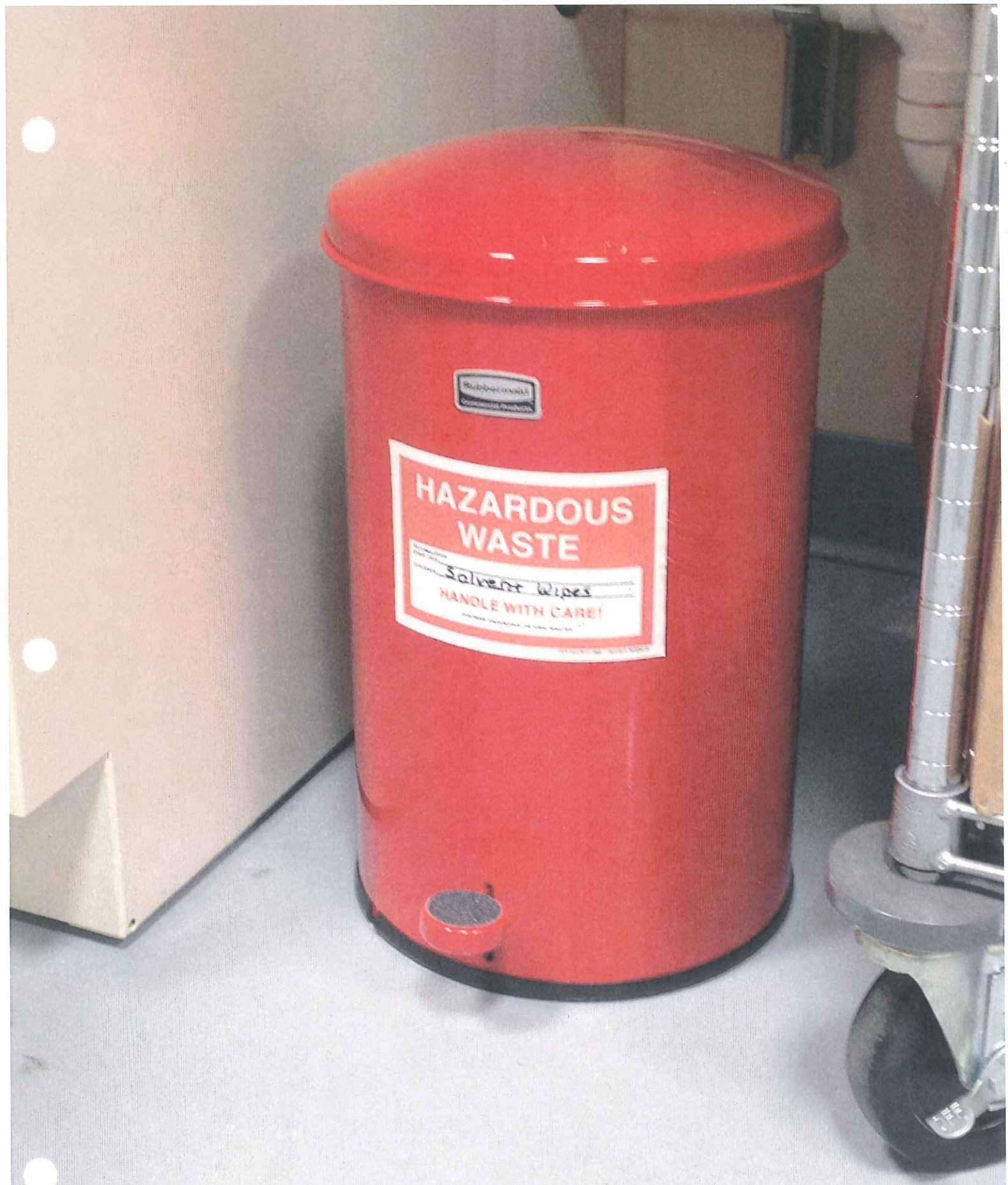
18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